

June 28, 1996

OFFICE OF THE HEARING EXAMINER
KING COUNTY, WASHINGTON
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REPORT AND RECOMMENDATION TO THE KING COUNTY COUNCIL.

SUBJECT: Department of Development and Environmental Services,
Land Use Services Division Applications for:

Proposed Northridge Fully Contained Community Permit
File No. L96FC001; Proposed Ordinance No. 96-325

Proposed Northridge Urban Planned Development Permit
File No. L94UP001; Proposed Ordinance No. 96-326

Proposed Northridge North Subdivision
File No. L95P005; Proposed Ordinance No. 96-327

**Proposed Amendments to the Bear Creek Area Zoning
P-Suffix Conditions**
File No. BCCP0002; Proposed Ordinance No. 96-329

Proposed Road Vacation (Bowman and C. Robstad Roads)
File No. V-2270; Proposed Ordinance No. 96-328

Property located in the Novelty Hill portion of the Bear Creek Community Planning Area, approximately 2 miles east of the City of Redmond and west of the City of Duvall, generally bounded by Novelty Hill Road on the north, Northeast 80th Street (if extended) on the south, 254th Avenue Northeast (if extended) on the east, and 219th Avenue Northeast (if extended) on the west.

SUMMARY OF RECOMMENDATIONS:

Division's Preliminary:	Approve, subject to conditions
Division's Final:	Approve, subject to conditions (modified)
Examiner:	Approve, subject to conditions (modified)

PRELIMINARY REPORT:

The Department of Development and Environmental Services Land Use Services Division's Preliminary Report on Items No. L96FC001, L94UP001, L95P0005, BCCP002, and the King County Department of Transportation's Report on Item V-2270 were received by the Examiner on April 15, 1996.

PUBLIC HEARING:

In conjunction with reviewing the Land Use Services Division's and Department of Transportation's reports, visiting the site and surrounding area, and examining available information on file with the applications, the Examiner conducted a public hearing on the subject as follows:

The hearing on Items No. L96FC001, L94UP001, L95P0005, BCCP0002, and V-2270 was opened by the Examiner at 9:18 a.m., April 29, 1996, in Hearing Room No. 2, Department of Development and Environmental Services, 3600 - 136th Place S.E., Suite A, Bellevue, Washington, and adjourned at 3:00 p.m. Subsequent hearings were held as follows:

DATE	PLACE	OPEN	ADJOURN/ CLOSE
4-30-96	Hearing Room 2*	9:15 AM	4:00 PM
5-1-96	Redmond City Council Chambers**	1:30 PM	8:30 PM
5-2-96	Hearing Room 2	9:15 AM	4:30 PM
5-3-96	Hearing Room 2	9:15 AM	4:35 PM
5-6-96	Hearing Room 2	9:15 AM	4:20 PM
5-7-96	Hearing Room 2	9:15 AM	4:28 PM
5-8-96	Emily Dickinson Elementary School***	1:30 PM	10:05 PM
5-9-96	Hearing Room 2	9:18 AM	4:30 PM
5-10-96	Hearing Room 2	9:15 AM	12:30 PM
5-13-96	Hearing Room 2	9:15 AM	4:30 PM
5-14-96	Hearing Room 2	9:15 AM	5:20 PM
5-15-96	Cherry Valley Elementary School****	4:00 PM	10:15 PM
5-16-96	Hearing Room 2	9:15 AM	4:45 PM
5-17-96	Hearing Room 2	9:15 AM	5:30 PM
5-20-96	Hearing Room 2	9:15 AM	4:40 PM
5-21-96	Hearing Room 2	9:15 AM	3:15 PM
5-22-96	Redmond City Council Chambers	1:30 PM	10:05 PM
5-23-96	Hearing Room 2	9:18 AM	4:45 PM
5-24-96	Hearing Room 2	9:15 AM	12:40 PM

* King County Department of Development and Environmental Services (DDes)
3600 - 136th Place Southeast Suite A
Bellevue, WA 98006

** Redmond Public Safety Bldg.
City Council Chambers
8701 160th NE
Redmond, WA

*** Emily Dickinson Elementary School Commons
7040 208th Avenue NE
Redmond, WA

**** Cherry Valley Elementary School
Lunchroom/Gym
2607 NE Cherry Valley Road
Duvall, WA

Participants at the public hearing and the exhibits offered and entered are listed in the attached minutes. A verbatim recording of the hearing is available in the Office of the King County Hearing Examiner.

FINDINGS, CONCLUSIONS & RECOMMENDATION: Having reviewed the record in this matter, the Examiner now makes and enters the following:

FINDINGS:

I. INTRODUCTION

1. General Information

Proposal Name: Northridge
Applicant: The Quadrant Corporation
P.O. Box 130
Bellevue, WA 98009
STR: Portions of Sections 33, 34, and 35,
Township 26N, Range 6 E.W.M., and
Portions of Section 2, 3, and 4,
Township 25N, Range 6 E.W.M.
Location: Generally bounded by Novelty Hill Road
on the north, Northeast 80th (if
extended) on the south, 219th Avenue
Northeast (if extended) on the west, and
244th Avenue Northeast on the east.

2. Except as modified herein, the facts set forth in the King County Land Use Services Division's Preliminary Report for Northridge, dated April 29, 1996, (published April 15, 1996) ("Staff Report") submitted to the King County Hearing Examiner ("Examiner") for the Northridge hearing are found to be correct and are incorporated herein by reference. The Staff Report recommends approval of the Northridge applications subject to conditions, including those contained within the revised proposed FCC/UPD permit. The Staff Report contains a summary description of the main elements of the proposal and should be read in conjunction with this recommendation.
3. Northridge constitutes the northern portion of the two Master Planned Development ("MPD") sites approved for urban density development by the King County Council within the 1989 Bear Creek Community Plan. The two properties lie atop a ridge between the Bear Creek Valley to the west and the Snoqualmie River to the east. As currently proposed, the two projects would create approximately 4,000 dwelling units of new housing on somewhat in excess of 2,000 acres of site area. Northridge is currently proposed as a 1,046-acre mixed use development to be constructed on the western portion of the 1,506-acre Quadrant property. A total of between 1,300 and 1,500 dwelling units would be constructed, 20% of which would be multi-family structures and 30% affordable to low, moderate and median income households. The projected residential population for Northridge would be approximately 4,200 people. Northridge also proposes to construct a neighborhood shopping center of 8.1 acres adjacent to Novelty Hill Road in the northern portion of the site and a 126-acre business park in the northeastern portion of the parcel which would provide 1.2 million square feet of facility space. After completion, the retail and business areas would provide jobs for an estimated 3,750 workers.
4. In 1991 the former Novelty Hill Master Plan Developments (now designated Urban Planned Developments under authority of KCC Title 21A) were identified within Ordinance 10153 as demonstration projects to evaluate (among other things) provision of expeditious permit review procedures. Pursuant to the timeline adopted within Ordinance 10153 the process for holding the public hearing on each Urban Planned Development ("UPD") application and preparing the Examiner's report was projected to take a total of 42 days. Comparable provisions within the text of Ordinance 11502 enacted in October 1994 provide a maximum 60-day time span for public

hearing and Examiner report preparation. The parties to the Northridge proceeding stipulated to an eight week period for the public hearing process and issuance of the Examiner's report.

5. The hearing on Quadrant's applications for an Urban Planned Development ("UPD") permit, a Fully Contained Community ("FCC") permit, Northridge North preliminary plat, road vacations and amendments to the Bear Creek Community Plan ("BCCP") P-Suffix conditions began April 29, 1996, and concluded May 24, 1996. During the 20-day hearing, four public testimony sessions were held on May 1st, May 8th, May 15th and May 22nd. The public hearings were held at the Redmond City Council Chambers on May 1st and May 22nd; at Emily Dickinson Elementary School on May 8th; and Cherry Valley School on May 15th.
6. As documented at pages 4 and 5 of the Staff Report the pre-hearing review process conducted by County staff took 40 months longer than the time allocated in the schedule for Ordinance 10153. Seventeen months of this delay resulted from a suspension of formal permit processing requested by the Applicant. Another five months may be attributed to the time necessary to reactivate the project and complete technical work and to diversion of efforts to the earlier Blakely Ridge hearings and formulating responses to the remand order issued by the Growth Management Hearings Board in December, 1995.

II. PROCEDURAL MATTERS

7. A Prehearing Conference was held on March 28, 1996, and a Final Prehearing Order was issued April 15, 1996. The Final Prehearing Order granted seven parties intervenor status, set time allocations for the Quadrant Corporation ("Quadrant"), King County (the "County") and Intervenors, established the hearing schedule, and resolved other prehearing matters. Additionally, the Prehearing Order requested interested parties to submit briefing on whether res judicata and collateral estoppel are applicable to the Examiner's recommendations on the Blakely Ridge UPD application regarding cumulative impacts of Blakely Ridge and Northridge. The Examiner also requested interested parties to submit information regarding statutory, regulatory or case law interpretations of the requirements for a fully contained community as set forth in RCW 36.70A.350.
8. A Draft Environmental Impact Statement (DEIS) for the Northridge UPD application was issued by King County and circulated for public review and comment in May, 1995. The Northridge Final Environmental Impact Statement (FEIS) was issued in January, 1996. Further revisions by Quadrant, analyzed in the FEIS, scaled back the size of the proposal by reducing the size of the business park from 1.6 million gross square feet ("gsf") to 1.2 million gsf. Including its technical appendices, the DEIS consists of four volumes and several hundred pages of environmental analysis. A 45-day comment period followed DEIS publication, the maximum period allowed by law. Public hearings on the DEIS were held on June 20 and June 29, 1995. The FEIS contains all comment letters received and responses thereto, and as well includes a transcript of the public hearing. The EIS analysis concluded that Northridge development will cause unavoidable significant adverse impacts in the areas of traffic, noise

and plant/animal habitat.

A number of intervenor parties have challenged the adequacy of the project EIS. EIS adequacy issues will be discussed after consideration of substantive environmental topics.

9. On April 30, 1996, the Applicant submitted to the hearing record as part of Exhibit No. 228 a stipulation between the Lake Washington School District ("LWSD") and Quadrant. The stipulation states that the parties agree that the Staff Report's analysis regarding schools is adequate to address LWSD's concerns regarding Northridge, and that LWSD and Quadrant have signed a letter of intent dated April 22, 1996, for the dedication of an elementary school site within Northridge. The stipulation provides that LWSD withdraw as an intervenor to the Northridge hearing and terminate its challenge to the adequacy of the EIS.
10. The Applicant also submitted a stipulation between the Lake of the Woods Homeowners' Association ("LOW") and Quadrant. The LOW stipulation was admitted into the hearing record on April 30, 1996, as part of Exhibit No. 228. Pursuant to the stipulation LOW withdrew from the Northridge hearing and agreed to accept additional mitigation for Welcome Lake and relating to traffic impacts. The stipulation provides for the Examiner's Report and Recommendation on Northridge to contain a condition identical to that adopted for Blakely Ridge relating to the formation of a lake management district for Welcome Lake.

III. ENVIRONMENTAL ELEMENTS

A. Transportation.

11. King County's Integrated Transportation Program ("ITP") is comprised of three components: Transportation Concurrency Management ("TCM"), the Mitigation Payment System ("MPS"), and Intersection Standards ("IS"). TCM seeks to assure that sufficient transportation capacity is available for new developments. MPS implements the transportation policies of the King County Comprehensive Plan and provides additional funding for capacity-related transportation improvements required by the Growth Management Act. IS enables significant adverse impacts to traffic resulting from new developments to be mitigated. King County's Integrated Transportation Program is a comprehensive set of development regulations designed to mitigate the traffic impacts of new development by establishing level of service standards, concurrency requirements, and safety improvements consistent with Comprehensive Plan policies and the Growth Management Act.
12. The Northridge development was tested for transportation concurrency jointly with Blakely Ridge. The County issued Quadrant a conditional transportation concurrency certificate indicating Northridge's compliance with the County's TCM program in March, 1995. Northridge is located in Transportation Service Area No. 3, which requires an area-wide average of LOS D. As a condition to their concurrency certificates, Northridge and Blakely Ridge are required to make concurrency improvements to 238th Avenue N.E., N.E. 133rd Street, and interim improvements to Novelty Hill Road.

13. Traffic impacts to key arterials impacted by Northridge were analyzed by establishing 1994 baseline conditions on critical links and other important roadways. The analysis modeled future traffic conditions to assess traffic operations with and without the development of Northridge. The TCM model established future benchmarks using the years 2000 and 2005, assuming full buildout of Northridge on an accelerated schedule by the year 2005. This assumption resulted in a "worst case" scenario for identifying the time when impacts would occur since development of Northridge is not likely to begin until 1998, and full build-out probably will not occur for 15 or more years thereafter. The only unfunded critical link identified in relation to Northridge was Novelty Hill Road from 208th Avenue N.E. east to the Northridge site.
14. The Northridge EIS traffic model included all current developments in the City of Redmond and King County that have been approved but not yet built, as supplemented by the land use forecasts of the City's and the County's Comprehensive Plans. The analysis evaluated traffic generation, distribution and assignment to determine traffic impacts relating to Northridge.
15. At the time that the DEIS was prepared, the Northridge proposal contained a 1.6 million gsf business park. After the preparation of the DEIS, Quadrant reduced the size of the proposed Northridge Business Park to 1.2 million gsf. The FEIS reanalyzed transportation impacts based on a smaller business park in three areas: traffic generation estimates, traffic forecasts which affect peak hour levels of service, and implementation of the transportation mitigation program. The downsizing of the Northridge business park reduced both traffic forecast volumes and estimated traffic delays at key off-site and UPD access intersections.
16. Assuming full buildout, downsizing results in a 24 percent reduction in the gross daily traffic generated by the business park, a reduction of approximately 5,000 daily trips. A reduction in net off-site traffic generation also occurs because of the internalization of traffic resulting from the mix of uses on site and the capture of retail pass-by trips by the Northridge retail center. However, a reduced business park produces less internalization of trips and higher net off-site residential trip generation. When these two factors are balanced, the smaller business park is projected to result in a 13% reduction in the net daily off-site trip generation from Northridge compared with the larger proposal analyzed in the DEIS.
17. The Northridge EIS traffic model determined that the off-site trip orientation for Northridge at buildout would be focused on five primary corridors: (1) Novelty Hill Road to and from the west; (2) 208th Avenue N.E. via Novelty Hill Road; (3) Novelty Hill Road to and from the east connecting to the West Snoqualmie Valley Road; (4) through Blakely Ridge to and from N.E. 133rd Street to the North Bear Creek Area; and (5) 238th/236th Avenue N.E. to Union Hill Road and SR 202.
18. Under the revised analysis contained in the FEIS, the average daily traffic volume attributable to Northridge at full buildout (assumed to be 2005) would be 25,880 average daily trips ("ADT") on the area roadway system equally split

between inbound and outbound trips. The total cumulative impact of Blakely Ridge and Northridge at full buildout (year 2005) would be 39,330 ADT distributed over three corridors: Novelty Hill Road; NE 133rd Street; and 236th/238th Avenue N.E. to Union Hill Road.

19. At full buildout, 20% of the PM peak hour trips attributable to Northridge will be internalized, and 8% of the PM peak trips will be pass-by trips to the retail area. Pass-by trips are trips already on the roadway for reasons unrelated to the development of Northridge. Approximately 32% of the PM peak hour trips at full buildout will be to and from the west on Novelty Hill Road or 208th Avenue N.E., while 10% will connect to and from the east via Novelty Hill Road and West Snoqualmie Valley Road. Thirteen percent of the gross traffic generation relating to Northridge during the PM peak hour at full buildout will connect through Blakely Ridge to the North Bear Creek area via N.E. 133rd Street. The remaining 17% of the PM peak hour traffic will connect to and from Northridge via 238th/236th N.E. to Union Hill Road or SR 202.
20. At full buildout, Northridge and Blakely Ridge together will generate the following percentages of total traffic volumes during the PM peak period:
 - 50% of Union Hill Road peak volumes at 238th Avenue N.E.;
 - 42% of the PM peak trips at the intersection of Novelty Hill Road and 208th Avenue N.E.;
 - 27% of the PM peak trips at Union Hill Road and 208th Avenue N.E.;
 - 20% of the PM peak trips at the Novelty Hill Road and Avondale Road intersection;
 - 17% of the trips at the intersection of Novelty Hill Road and West Snoqualmie Valley Road;
 - 13% of the PM peak trips at 244th Avenue N.E. and SR 202;
 - 11% of the PM peak trips at the intersection of Union Hill Road and Avondale Road;
 - 8% of the PM peak trips at SR 202 and N.E. 124th Street;
 - 7% of the PM peak trips at N.E. 128th Street and Avondale Road; and
 - 4% of the PM peak trips at Avondale Way/Redmond Way/Cleveland Street (SR 202).
21. The two fundamental components of the off-site transportation mitigation program are the MPS payments and the safety and operational improvements. MPS fees will be based on Northridge's share of costs for providing additional capacity improvements and cannot be used for remedying existing roadway deficiencies. Northridge will pay an MPS fee total of \$5.4 million, primarily for improvements to Novelty Hill Road, Union Hill Road, the Avondale Road corridor, N.E. 133rd Street and 236th/238th

Avenue N.E., N.E. 124th Street at Woodinville/Duvall Road, and WSDOT projects (SR 520/SR 202 interchange and the widening of SR 202 west of Sahalee Way).

22. Safety and operational improvements are required to meet the County's Intersection Standards. Quadrant will either pay \$3.5 million or construct needed safety and operational improvements, in addition to constructing the interim improvements required by its concurrency certificate for Northridge. Quadrant will make safety and operational improvements to the following intersections and roadways: N.E. 133rd Street (Projects J1, J2 and C in the TMP); Novelty Hill Road east of Blakely Ridge (Project B); the intersection of N.E. 124th Street at West Snoqualmie Valley Road (Project F); the intersection of Novelty Hill Road at West Snoqualmie Valley Road (Project E); Novelty Hill Road (Projects L, A1-1 and A1-2); the intersection of Novelty Hill Road at 208th Avenue N.E. (Project A1-2); the intersection of Redmond Road and Novelty Hill Road (Project A1-3); Novelty Hill Road at Avondale Road (Project A1-4); the intersection of 208th Avenue N.E. and Union Hill Road (Project G); 238th/236th Avenue N.E. (Projects D, H2 and I); and the intersection of 238th/236th Avenue N.E. and Union Hill Road (Project H1).
23. The County's capital facilities program includes a 6-year CIP list for road projects. Projects included on the CIP list are programmed for construction and appear to be substantially certain in their funding. The County's improvement of Avondale Road south of N.E. 133rd Street already has been fully funded for construction and is essentially complete. The following projects are programmed for construction in the next six years: Avondale Road north of N.E. 133rd Street; N.E. 133rd Street west of Avondale Road; N.E. 128th Street west of Avondale Road; N.E. 124th Street west of SR 202; Novelty Hill Road from Avondale Road to Redmond Road; Union Hill Road west of 208th Avenue N.E.; and the N.E. 124th Street bridge east of West Snoqualmie Valley Road. Improvements to the following intersections are programmed for construction in the next six years: Union Hill Road and 208th Avenue N.E.; 238th/236th Avenue N.E. and Union Hill Road; Novelty Hill Road and West Snoqualmie Road; and N.E. 124th Street and West Snoqualmie Road. Improvements to Novelty Hill Road from Redmond Road to the western boundary of the Northridge Site are in the process of right-of-way acquisition and project design but are not yet programmed for construction.
24. Currently, two intersections on Avondale Road within the City of Redmond operate at LOS F. At full buildout of either Northridge alone or concurrently with Blakely Ridge, the LOS for Avondale Road at these Redmond intersections will remain LOS F. An LOS F for Avondale Road at these two intersections is acceptable under the County's concurrency program if the average LOS for the entire service area remains, as projected, at LOS D at full buildout of Northridge and Blakely Ridge.
25. The most critical traffic corridor relative to Northridge is Novelty Hill Road. The TMP establishes thresholds to trigger improvements to assure adequate capacity on Novelty Hill Road. The first threshold occurs when the PM peak hour traffic volumes reach 1,200 vehicles per hour, and the second threshold when the eastbound PM peak hour trips on Novelty Hill Road east of 208th Avenue N.E. reach

- 1,350 vehicles per hour. At the second threshold, construction and improvements to either N.E. 133rd Street or to 238th/236th Avenue N.E. must be made, as determined by the County. The third threshold occurs when the 1,350 vehicles per hour in the eastbound direction is again reached on Novelty Hill Road east of 208th Avenue N.E. This threshold will trigger whichever improvement to N.E. 133rd Street or 238th/236th Avenue N.E. was not previously constructed. A fourth threshold for capacity improvements on Novelty Hill Road was established during the Blakely Ridge hearing and remains controversial. It will be further discussed during the section on midpoint review.
26. Qualitatively, the most severe traffic impacts from the development of Northridge and Blakely Ridge will be experienced at the southern and northern extremities respectively of the two UPDs, where the two new north/south arterial systems through the projects will exit. Although in 1989 the roadway systems in these two areas were appropriately designated as arterials in anticipation of UPD development, they currently experience low levels of traffic use. Impacts from development of the Northeast 133rd Street corridor on the Lake of the Woods neighborhood were discussed during the review of the Blakely Ridge application. The corresponding circumstance anticipated at the south end of the Northridge onsite arterial will be encountered within the 236th/238th Avenue Northeast corridor.
27. The most drastically impacted section of roadway south of Northridge will be a short section of 238th Avenue Northeast which lies between Northeast 80th Street and Union Hill Road. This is a 20-foot wide section of rural roadway constructed without substantial shoulders which currently experiences an average daily trip total of about 800 and a PM/peak hour count of approximately 80 vehicles. For the year 2005 after buildout of both UPDs and completion of the north/south arterial system through Northridge, the ADT on this section of roadway is predicted to rise to over 10,000 vehicles with a PM/peak of approximately 1,100 vehicles. While the road is planned to be widened to 22 feet of pavement with 8-foot shoulders and will operate at an acceptable level of service, the magnitude of change which will be experienced by the five or six residential properties closest to the roadway will be profound and may have a devastating effect on their currently quiet rural lifestyle. In an effort to provide some mitigation for these impacts, Staff has revised its proposed traffic conditions to require screening, landscaping and/or fencing for lots with existing driveway access to 238th Avenue Northeast and any residences within 60 feet of the roadway. Even with mitigation, however, lifestyle impacts to these residential properties will be severe.
28. Construction of a southern arterial access to Northridge will increase project impacts to the Union Hill Road corridor. The King County portion of this corridor is currently a two lane winding rural roadway with steep sections and narrow shoulders. East of 208th Avenue Northeast Union Hill Road is classified a collector arterial, while west of 208th it is designated a minor arterial. A County CIP project has been funded for construction in 2001 of a hillclimb lane and other safety improvements along Union Hill Road between 198th Avenue Northeast and 206th Avenue Northeast. In addition, a number

of widening and capacity projects have been or will be constructed west of 192nd Avenue Northeast in Redmond near the Avondale Road intersection, which, as previously noted, currently operates at LOS F and is projected to so remain under all scenarios absent major improvements.

29. Impacts to the Union Hill Road corridor within the City limits is a major component of Redmond's critique of the Northridge EIS. The City has launched a major attack upon both the traffic analysis contained within the Northridge EIS and the standards upon which King County staff proposes to base mitigation payments for traffic impacts to Redmond facilities. On an analytical level, Redmond engineering staff and consultants have challenged the accuracy of the trip distribution and assignment assumptions which underlie the EIS discussion. First, Redmond questions whether the EIS consultant has properly distributed trips westward from Northridge between the Novelty Hill and Union Hill Road corridors. Secondly, Redmond questions whether the EIS correctly describes the distribution of trips to different portions of the City and whether adequate land use assumptions were made in analyzing the attractiveness of Redmond destinations. Regarding roadway capacity issues, Redmond consultant Terry Gibson argued that the EIS model over-estimated the capacity of both the Phase I SR-202 overpass and Novelty Hill Road after expansion to three lanes.
30. In terms of the mitigation proposed for Redmond by King County Staff, the City has challenged the impact thresholds contained within the County's recently adopted Integrated Transportation Program as not representing an adequate measure of the Northridge's effects on City facilities. The City notes that the County's use of individual project traffic generation percentages as a mitigation threshold is not an impact-based methodology because it allows developer obligations to fluctuate without regard to the absolute level of adverse impact. Redmond compares the County's system unfavorably with the City's SEPA policy of requiring proportionate share payments whenever a project contributes 10 PM peak hour trips to any facility operating at worse than an LOS D condition. The City also sees no rationale for the County's insistence on using the Blakely Ridge Memorandum of Understanding as a template for Northridge mitigation, nor for reducing mitigation payments to the City on the basis of assumed double counting of trip-end credits or exclusion of recently constructed projects from fee calculations.
31. The EIS consultant, Larry Toedtli, has responded to the City's critique of the EIS analytical method. While there is always room for disagreement, Mr. Toedtli's modeling decisions seem to be defensible and, in some cases, superior to the City's methodology. In particular, Mr. Toedtli's use of a complex land use grid for distributing trips offsite from Northridge appears preferable to the City's centroid analysis. The EIS' reliance on time and distance factors in allocating traffic between the Novelty Hill and Union Hill corridors also is rationally based. On the other hand, the City's method of allocation of Northridge traffic within Redmond itself is more sophisticated than the model used by Mr. Toedtli, which lumps together Overlake area traffic within both Bellevue and Redmond and uses less detailed land use information for the City's central business district and Town Center area.

32. However, it is not necessary for the instant review to finally resolve the data analysis issues raised by Redmond, nor is it necessary for us to choose between competing models for traffic mitigation. Whatever the ultimate merits of Redmond's position, applicable state laws and county ordinances circumscribe, as a practical matter, the framework for discussing traffic impacts to Redmond facilities. Four elements affect the regulatory analysis of Redmond traffic impacts: first, state SEPA law; second, applicable King County ordinances; third, the absence of an interlocal agreement or memorandum of understanding between King County and Redmond incorporating this project; and, fourth, the fact that Redmond's traffic mitigation methodology has not been adopted by ordinance.
33. In the absence of an interlocal agreement with Redmond, mitigation by King County for traffic impacts to Redmond facilities must necessarily be based on the State Environmental Policy Act. The fundamental source of SEPA authority for mitigation of impacts is found at RCW 43.21C.060, which provides that a project proposal may be conditioned or denied under SEPA provided that "such conditions or denials shall be based upon policies identified by the appropriate governmental authority and incorporated into regulations, plans or codes which are formally designated by the agency (or appropriate legislative body, in the case of local government) as possible bases for the exercise of authority" under SEPA. The section proceeds to state that proposals may be "conditioned only to mitigate specific adverse environmental impacts which are identified in the environmental documents prepared" under SEPA. Thus, while pursuant to WAC 197-11-060(4)(b) King County may be required to consider a proposal's impacts beyond its jurisdictional boundaries, the County's authority to mitigate for such impacts is limited to the standards and provisions contained within its adopted policies and ordinances.
34. Accordingly, we are not required to address the question of whether King County's standards do a better job than Redmond's in addressing Northridge's adverse impacts to Redmond traffic facilities. King County lacks authority under SEPA to apply any mitigation measures other than those supplied by its own regulatory framework. In the absence of a interlocal agreement, it is clear that the standards to be applied are limited to those stated within the County's Integrated Transportation Program contained in Ordinance 11617, which supports impact mitigation to Redmond in the range between \$829,556 and \$1,114,547. Staff was correct in concluding that the appropriate standard for mitigating traffic impacts pursuant to SEPA is stated at KCC 14.80.030, which authorizes mitigation at intersections operating at LOS F which will carry 30 or more project trips within any one hour period and where such trips comprise at least 20% of the new traffic generated by the development during that same timeframe. We note that County SEPA authority for mitigation of road impacts also extends to the correction of safety hazards, but no attempt has been made by Redmond to establish that any of the mitigation fees requested are safety hazard related. Further, since Redmond's SEPA-based traffic mitigation program appears to be purely the product of City staff policy, no claim can be made for it as an adopted legislative standard deserving of special weight or deference.

35. KCC 14.80.050 also allows the County to enter into interjurisdictional agreements with cities such as Redmond for the mitigation of traffic impacts based on the City's level of service standards. However, any decision to substantially modify applicable County standards for impact mitigation necessarily involves the exercise of legislative discretion and is beyond the scope of this quasi-judicial review process. The permit conditions proposed by County Staff provide some latitude for minor adjustments to accommodate Redmond's standards in the application of mitigation requirements but properly do not go far beyond the level which can be supported by the strict application of existing County requirements.
36. The foregoing analysis of King County SEPA authority to mitigate extra-jurisdictional traffic impacts is not altered or modified by the provisions of KCC 14.80.060.C, which reserve to the County authority to deny or condition proposals based on SEPA review. This provision merely recognizes that County substantive authority under SEPA to mitigate for road impacts may be found in locations other than Ordinance 11617 such as, for example, Comprehensive and community plan policies. In the instant case, however, the policies of the 1994 Comprehensive Plan are consistent with the framework for mitigation provided by Ordinance 11617, and Bear Creek Community Plan policy 45A simply reiterates the principle that "mitigation of traffic impacts to the City of Redmond arterial system will be accomplished through the interlocal agreement process."
37. Pursuant to existing Bear Creek Community Plan policies and P-suffix conditions, provision of traffic demand management programs and alternatives to single occupant vehicle travel has been a consistent part of the planning process for Northridge. However, the recent addition of a Fully Contained Community component to the review package places even greater emphasis on alternative transportation programs and appropriate site planning. In response to these changes in the regulatory framework, the permit conditions recommended by Staff have been upgraded to include more firm performance goals. The Staff recommendations are found primarily in Section 2.3.H of the UPD permit and within Sections 8.2 and 10 of Attachment 11. The amended conditions include requirements for appropriate road design features to accommodate transit service, including locations for bus stop shelters. In addition, Section 10 of Attachment 11 now includes a firm 6% goal for the reduction of peak hour off-site trips through transportation demand management strategies. This is in addition to previously established requirements for an onsite transportation coordinator, a 50 vehicle park/pool lot, and transit shuttle service.
38. Testimony from transit consultants Kim van Ekstrom of Redmond and Michael Stringam representing the Coalition for Public Trust ("CPT") have suggested that a 6% peak hour traffic reduction goal through TDM measures is too modest a target. By way of comparison, the State Commute Trip Reduction Act has been cited as establishing an upper end target of 35% trip reduction. But, as has been pointed out by Staff and Applicant witnesses, the Commute Trip Reduction statutory targets are framed within a much more restrictive context. These statutory targets are applied to large employers who are in a position to exercise substantial

control over their employees' commuting behavior. The 6% Northridge target, on the other hand, applies to project peak hour traffic across the board, including both business park and residential commute trips. A 6% total reduction translates effectively into a 15% reduction if simply applied to business park employees.

39. Further, as documented within the County Transportation Department's six-year transit development plan issued in December 1995, the Eastside area historically has had the lowest level of overall transit use within King County and is characterized by a number of barriers to effective transit management planning. Relevant factors include employment destinations for Eastside workers which are geographically dispersed, often characterized by low density commercial development with abundant free parking, and in the case of traffic to and from Northridge, are accessed by congested roadways lacking HOV facilities. Moreover, the Novelty Hill Road area currently lacks regular commute period bus service. Within this context, the 6% reduction target appears to be a reasonable figure. However, the Examiner's recommendation includes some further clarification of the terms stated in Section 10 of Attachment 11 designed to emphasize the mandatory nature of the TMP provisions.

B. Air Quality and Noise.

40. Impacts to air quality were analyzed in the DEIS for both short-term, construction-related impacts and for long-term impacts after construction. During construction water spraying and wheel washing will be required to reduce airborne particles. Burning will be prohibited on the site, and Quadrant will be required to chip and reuse woody debris from clearing. Long-term air quality impacts will most likely be generated from increased automobile traffic, natural gas furnaces, and fireplaces. Wood-burning stoves can also be a significant contributor to air pollution, and only certified wood stoves will be permitted in Northridge.
41. The model used to determine air quality impacts for the DEIS study employed traffic counts projected before the proposal's business park was reduced. The smaller business park will reduce traffic impacts below those originally estimated in the DEIS. Cumulative impacts to national ambient air quality standards also were modeled for Northridge and Blakely Ridge jointly. Applying these standards, cumulative impacts to air quality resulting from development of Northridge and Blakely Ridge will not be significant.
42. Existing noise levels near the site are already high because of traffic along arterial roads. Long-term noise impacts from the proposal are primarily traffic related. Background conditions were defined by establishing off-site noise receptors and conducting noise readings at those locations. Analysis of potential noise impacts was also based on the larger business park proposal. Reducing the size of the business park will slightly lessen potential noise impacts. Short-term construction noise associated with equipment will be mitigated by using engine mufflers. Many noise impacts will be naturally buffered by distance and the existing vegetation. UPD Conditions 2.2.7.G and H impose conditions during the construction phase upon the times,

locations and operating conditions for certain noise generators such as wood chippers and stump grinders.

43. Due to the presently undeveloped condition of the Northridge property, its conversion to an urban environment will necessarily increase ambient noise levels within the immediate vicinity. Because these increases will at some locations exceed 10 dBA, the DEIS characterizes such noise impacts as unavoidable and significant. Nonetheless, the levels anticipated will not exceed applicable County noise standards and do not require specific mitigation.
44. Noise consultant Errol Nelson testified on behalf of the Coalition for Public Trust and criticized the EIS noise study for projecting long term noise impacts based on intermittent 15 minute noise samples. According to his testing data, existing noise levels along major Bear Creek traffic corridors are higher than the levels described in the DEIS. Even so, the projected increases caused by Northridge will be relatively minor, and the King County noise ordinance exempts from regulatory control traffic noise on public roads. Therefore, small increases to already existing high traffic-generated noise levels must be regarded as part of a general public health problem beyond the scope of this permit review.

C. Wetlands.

45. There are 147 acres of wetlands on the Northridge site, ranging from less than 0.01 acres in area to wetland complexes over 50 acres in size. Within this total, there are nearly 106 acres of Class I wetlands, 39 acres of Class II wetlands and 2.3 acres of Class III wetlands, as designated by King County.
46. In constructing Northridge 0.97 acres of wetlands will be filled. Wetlands will be filled for residential uses, road crossings, road widening, and the construction of wetland outlet control structures. Additionally, approximately 0.37 acres of over-story alteration will occur on-site. Hydrologic impacts to on- and off-site wetlands were analyzed pursuant to the HSPF modeling program and were determined to be generally within the water level criteria established by the Bear Creek Community Plan. The stormwater drainage and treatment facilities for Northridge will largely maintain predevelopment seasonal water levels and fluctuations. Some minor increases in water level will occur during the late summer and fall, but these increases will have no significant adverse effect on the wetlands.
47. Quadrant will compensate for the amount of wetlands filled by restoring a wetland connection (removing an old road), providing wetland enhancement within the gas line easement, and enhancing wetlands at the south of the property. Wetlands will be protected on-site by a combination of stormwater runoff control, preservation of native forest open spaces, including 100- and 200-foot wetland buffers as required under the BCCP, and provision of additional native open space. Wetland functions will also be protected through water quality treatment, sediment catchment, infiltration return, and erosion control strategies.
48. Project intrusions into the wetland system will probably be most noticeable within the outer portions of wetland

buffers. The outer half of the 200-foot buffers provided under the Bear Creek Community Plan will continue to be nibbled away by UPD development. DDES has consented to the uncompensated use of up to 5% of the buffer area within any given drainage sub-basin for soft surface trails, drainage facilities, and underground utilities. For Northridge this will include the placement of R/D ponds in the outer 100 feet of 200-foot buffers in order to provide positive drainage to wetlands. The DEIS states that these various encroachments "would remove small areas of moderate to relatively high quality native forest habitat along the outer portions of the wetland buffers, thus adding to the loss of native habitat across the UPD site." The Applicant will compensate for these buffer losses by contributing a 15-acre upland area located near the major central wetland complex as native protection area in order to connect the various protected habitat elements into a single undivided block.

49. As noted above, by diverting surface water runoff to the wetland system in appropriate quantities Northridge will maintain predevelopment wetland hydrology within most onsite wetland systems. Three wetlands currently impounded by beaver dams will be outfitted with low-flow bypass systems to avoid creation of flooding conditions. Only the northern lobe of Wetland EC-3 will fail to replicate predevelopment hydrology. This wetland, however, has been impounded by an artificial berm offsite, and therefore the proposed modulation of its current water level fluctuation rate will more nearly mimic a natural condition.
50. During the construction phase a 30-fold increase in sediment yields to wetlands is projected to occur, but due to the very low predevelopment sediment generation rates, this increase is not considered to be significant. It is generally comparable to the sediment load resulting from a major storm event.

D. Plants and Animals.

51. Historically, the Northridge site was used for timber production and was last harvested approximately 60 years ago. As a result, the site is dominated by second and third growth forest and provides a high-quality wildlife habitat because of its diverse mixture of upland and wetland systems. Approximately 55% of the site, 577 acres, will be set aside within a Natural Resource Protection Area focused on protecting the on-site wetlands and adjacent habitat areas. The imposition of substantial buffers around the wetlands pursuant to the BCCP allows large blocks of native open space to be preserved and minimizes resource fragmentation. These large open space areas will connect off-site north through the Blakely Ridge property to the City of Redmond watershed located west of Blakely Ridge. In this way, important off-site habitat network links will be maintained.
52. In wildlife and plant surveys conducted from 1983 through 1995, no endangered species were identified as currently using the site. The property accommodates a broad array of wildlife, including a range of birds, mammals, reptiles and amphibians. Large-mammal use of the site by bobcat, bear, mink, weasel, beaver, and deer will no doubt decrease after development, with bobcat and bear use probably ceasing

altogether. The site is used by pileated and other woodpecker species for foraging, a use which will probably continue so long as wetlands remain. Wetlands are also visited by herons, which also are likely to return so long as the wetlands function to produce suitable food.

53. Despite substantial mitigation, however, there will be unavoidable losses to wildlife habitat and values. The project will contribute to the significant cumulative loss of upland forest habitat within the Bear Creek area. Native vegetation communities will be diminished and replaced with more edge, ornamental and invasive species. Even with mitigation, therefore, the project will result in a significant net loss of habitat diversity, quality and quantity.
54. The contribution of Northridge site development to a general process of regional degradation of native wildlife habitat was underscored by testimony presented by Professor David Barash of the University of Washington. Although he offered no evidence of specific errors in the EIS data, Dr. Barash criticized the adequacy of the sampling assessment techniques employed and noted that the EIS contained no migratory bird species analysis or seasonal mammalian data. He pointed out a complete absence of information on amphibians and invertebrates. Dr. Barash believes that habitat fragmentation contributes to nest parasitism by edge species such as cow birds, which may, in turn, be a major factor in the recent crash world-wide of song bird populations.
55. Lying at the top of a regional plateau, the Northridge property contains only rudimentary stream features but provides headwater flows to both the Bear and Evans Creek systems. These stream systems support significant populations of sockeye, coho and chinook salmon and cutthroat trout. Stream system concerns emanating from development of Northridge primarily relate to the maintenance of water quality and base flows, both of which are extensively addressed within the project's Master Drainage Plan ("MDP").

E. Surface Water.

56. The BCCP policies and P-Suffix conditions require that a Master Drainage Plan be prepared and submitted for any master plan development in the Novelty Hill Area. Section 8 of the BCCP P-Suffix conditions establishes stringent standards to be implemented in the MDP. A MDP for the Northridge FCC/UPD site was recommended for approval through a letter dated April 15, 1996, from Robert Derrick, Director of DDES. The Northridge MDP was completed in accordance with the County's *Master Drainage Planning for Large-Site Developments, Process and Requirements Guidelines*, adopted in 1995.
57. DDES determined that the Northridge MDP met applicable planning objectives for adequately controlling surface water from the Northridge FCC/UPD, complying with all codes and regulations, and will prevent significant adverse impacts to the natural hydrological system through implementation of the mitigation measures provided in the plan, as modified by the conditions and corrections provided in the April 15 DDES letter. The Northridge MDP incorporates the following

features:

- Use of the sophisticated HSPF (hydraulic simulation program - FORTRAN) model (calibrated to actual site flow measurements) to estimate long-term runoff cycles and demonstrate satisfactory performance of detention pond volumes and release rates;
- Mitigation for stream and wetland impacts from site runoff, including infiltration of developed site runoff within the Mackey Creek and Rutherford Creek basins; detention in excess of the Stream Protection Standard within the Bear Creek basin; and wetland fluctuation controls in the Bear Creek basin as specified in the BCCP;
- Evaluation of impacts to water quality and fisheries resources. The stormwater treatment facilities provided meet or exceed the requirements of the present Surface Water Design Manual (SWDM);
- Delineation of wetlands and evaluation of hydrologic impacts, with mitigation established to prevent significant adverse impacts.

58. The Northridge FCC/UPD is located entirely within the Bear/Evans Creek basin, with approximately 63% of the site runoff flowing south to the Evans Creek system and approximately 37% flowing generally north into the Big Bear Creek basin. (Although some 256 acres of Quadrant's overall property holding in the Novelty Hill area drains easterly to the Snoqualmie River, no portion of the 1,046-acre Northridge FCC/UPD site is located within the Snoqualmie River basin.) Drainage originating on the site provides headwater flows to the tributaries of Colin, Mackey, Rutherford, and Evans Creeks. The Northridge FCC/UPD site is relatively flat and contains only one stream on the site, approximately 250 feet in length, which flows out of wetland BBC UN 1.

59. The western boundary of the Northridge Site is over three miles from Bear Creek. On-site wetlands form the headwaters of Colin Creek, which flows to Welcome Lake, then to Struve Creek, which ultimately joins Bear Creek. Ground water seepage from the site contributes to the formation of Mackey Creek about 1,000 feet from the site, which in turn also joins Bear Creek. Subsurface flow from on-site wetlands extends south to Wetland EC-3, which forms the headwaters of Rutherford Creek, then flows to Evans Creek. Surface waters from the site also flow directly to Evans Creek within Tributary 0113, which originates immediately south of Northridge. Evans Creek empties into Big Bear Creek near Redmond.

Northridge constitutes a very small portion overall of the Bear-Evans Creek basin, which encompasses approximately 50 square miles with Northridge constituting approximately 3% of the total. Of the 42% (439 acres) of the FCC/UPD site to be developed, only 115 acres (26% of the developed area and 11% of the total 1,046-acre site) will be improved with impervious surfaces such as streets, building rooftops, or parking lots. Approximately 58% of the Northridge site will be left as open space, including 51% as natural open space, further reducing the impacts of development on the downstream drainage system.

60. Evaluation of surface water impacts from Northridge was based upon a wide range of performance standards and criteria, including P-Suffix Condition 8 in the Bear Creek Community Plan, the Surface Water Design Manual and its updates, the Bear Creek Basin Plan, the Sensitive Areas Ordinance (KCC 21A.24), and the recently published *Master Drainage Plan Guidelines for Large-Site Developments*. The principal components of the drainage system include detention facilities for storage and peak flow control for the central and eastern portions of the FCC/UPD (approximately 60% of the site) and stormwater infiltration for the western portion (approximately 40% of the site) where Vashon Advance sands and gravels and the general absence of underlying glacial till make infiltration feasible.
61. There will be no significant erosion or sedimentation impacts on any of the downstream tributaries resulting from the development of Northridge. While there will be increases in total runoff volumes, these increased quantities will discharge throughout the year at low rates of flow after detention and water quality treatment. There may be some increased base flow in Mackey Creek from the infiltration facilities, but this increase should not cause significant geomorphic changes. No significant erosion or sedimentation impacts are expected to occur in the on-site or off-site wetlands that constitute the headwaters of Colin Creek, nor is Colin Creek likely to have any increased channel erosion in response to Northridge stormwater discharges. Likewise, Rutherford and Evans Creeks are unlikely to experience any increased erosion or sedimentation. The Northridge MDP is designed to maintain the stability of off-site streams and their habitat characteristics.
62. The Northridge MDP, as recommended for approval by DDES, substantially meets the goals and objectives of the BCCP environmental conditions, i.e., P-Suffix Condition No. 8. The 147 acres of wetlands will generally be protected from both direct intrusion and other secondary adverse impacts by a total of 392 acres of wetland buffers. With regard to fluctuations in wetland water levels, P-Suffix Condition No. 8J will be substantially met, as previously discussed.
63. The Northridge infiltration facilities are a key component of the MDP and a principal element in mitigating potential impacts to surface water (and to ground water, as discussed below). Safety factors have also been built into the design of these facilities, including a safety factor of two to four applied to the tested rates of infiltration. These infiltration rates will be retested before and after construction and monitored for proper operation. Additional land will be set aside near each infiltration facility during the initial one to two years required for test rate monitoring and will be available if facility expansion is necessary in order to meet projected rates of infiltration.
64. In view of the massive amount of data presented in the Northridge Master Drainage Plan concerning surface water control and management, the public hearing produced a surprisingly small amount of adverse comment concerning surface water issues. There was some arcane discussion of the standard KS value to be used within the HSPF model and whether the MDP deviation from the program's default value

was justified by the data and potentially productive of incorrect predictions. It seems that the KS value affects routing speeds and volumes within the downstream system being analyzed. The KS discussion was inconclusive, but minor variations do not appear to be productive of significant changes in the impact predictions for the downstream system. In a similar vein, a 2% increase in peak flows to the Colin Creek system from the Northridge R/D facilities was understood to be inconsequential because it only occurs within a culvert lying under Novelty Hill Road between Wetlands BBC-45 and BBC-44.

65. Paul Fendt, an engineer appearing on behalf of the City of Redmond, questioned whether onsite wetlands were being used for improper storage of stormwater flows. Examining the MDP provisions, no such use seems apparent. The proposed capacity of Northridge R/D ponds will be 3 to 4 times that required by the 1990 SWM manual, and use of wetlands as primary detention will not occur. As described above, onsite wetlands which will receive flows from R/D facilities will maintain predevelopment water levels as required by the Bear Creek Plan. Even so, some wetlands will receive increased flow volumes over an annual cycle which will be experienced as reaching inundation sooner in the late summer/early fall flow cycle. The MDP wetland assessment assigns no adverse consequences to this minor hydrologic change. Therefore, such surface water flows to wetlands will not violate the qualitative requirements of KCC 21A.24.330.H.1 nor result in the use of wetlands for peak rate runoff control within the meaning of the SWM Manual.

Finally, the proposed infiltration of approximately 40% of site runoff flows in order to maintain aquifer recharge rates has raised questions concerning infiltration facility performance and maintenance which will be discussed within the groundwater section of this report.

F. Erosion and Sedimentation.

66. The terrain of the Northridge site is gently rolling with numerous depressions, some of which include wetlands. Moderate to steep slopes separate the upland plateau from the adjacent Snoqualmie Valley floor. The geology of the site is dominated by glacial till ranging in thickness from 20 to 80 feet, which overlies advance outwash or older deposits. In the westerly portion of the site, there are holes or windows in the till cap. In these areas, relatively permeable outwash sand and gravel have been deposited directly underneath the surface soils or recessional deposits. The significance of the till cap underlying the Northridge Site is that the geology is very stable and generally has low or very low permeability so that recharge rates to underlying aquifers is limited.
67. On the Northridge Site there are the following geological hazard areas: steep slopes on the upland plateau which have been determined not to be subject to landslides; wetlands (seismic hazard areas); and several erosion hazard areas. The on-site level of current soil erosion and sedimentation is unusually low for this type of forested area. This existing low soil erosion and sedimentation rate is attributable to an absence of significant topographical gradients on the site, high sediment trapping efficiency in

the on-site wetlands, and the lack of an integrated stream system on-site for sediment transportation.

68. In determining erosional impacts from Northridge during and after construction, it was assumed that the project would be fully built within one year instead of over the anticipated ten to twenty years. This assumption presents a "worst case" situation. Under this worst-case assumption, the sediment yield will increase during construction by a factor of 140%, which must be viewed in the context of a site with unusually low pre-development sediment yields. The majority of the increased sediment will be removed by the on-site detention facilities. The remaining amount will go into the wetland buffers, which have high sediment trapping efficiency. The increase sediment yield projected to reach the wetlands during the construction phase is within the range of natural storm event sedimentation impacts and will not affect wetland functions. Impacts to off-site wetlands during construction will be minor.
69. A temporary erosion and sedimentation control plan ("TESCP") will be required by the County to minimize construction erosion and sedimentation. The TESCP will limit clearing and grading activities to the dry season, require the retention of native vegetation, and impose additional controls in medium and high erosion areas. Quadrant will also be required to provide funds for site monitoring during construction.
70. After construction, an increased sediment yield also will occur to on-site wetlands; however, this increase will be minimal. Northridge has been designed to avoid erosive impacts to wetlands through the use of extensive buffers and retention/detention facilities to capture sediments. Although there will be some increase in sediment leaving the site, the amount is within naturally occurring variations and therefore unlikely to have any long-term significance to stream processes. Downstream systems will receive increased volumes of stormwater runoff as a result of the increase in impervious surfaces associated with the development of Northridge and a net decrease in evapotranspiration from vegetation on the site. However, proposed detention facilities on the site will adequately limit peak flow rates and durations. The increased flows will primarily occur during normal low flow periods and are not likely to destabilize the existing geomorphic balance of the downstream drainage system. Baseline stream channel monitoring will be conducted to provide a reference for evaluating any observed channel changes after construction.

G. Groundwater.

71. As in the Blakely Ridge hearing, the most vigorously contested factual issues raised by the Northridge record concern the potential impacts of the Northridge FCC/UPD development on groundwater resources. This issue has been raised by three different intervenor parties.
72. The Union Hill Water Association (UHWA) has a 1,300 gallon per minute (gpm) water right (although at present UHWA withdraws on average only 375 gpm) which is serviced by a deep well (UHWA Well No. 1) located two miles south of the project boundary. UHWA has drilled two other wells into the deep aquifer, including UHWA Well No. 3 located just

southwest of the Northridge Site, but these two wells have not been approved for ground water withdrawal by the Washington State Department of Ecology. UHWA's concerns are that the Northridge site lies within the recharge area for the UHWA wells as described in UHWA's draft wellhead protection plan and that site development at Northridge will create impervious surfaces which will interfere with aquifer recharge.

73. The Novelty Hill Ranch Estates Homeowners' Association is also an intervenor and represents 27 lots on 100 acres located across Novelty Hill Road immediately north of Northridge. Novelty Hill Ranch Estates contains some 20 developed lots that rely upon private wells, including community wells serving up to 4 lots apiece. The Novelty Hill Ranch Estates' wells tap locally-recharged water in the Vashon advance aquifer just beneath the regional glacial till layer. Generally, shallow depths and low pump rates for small domestic wells translate into a relatively limited local recharge area. Quadrant's geologist testified that the recharge zones for the domestic wells within Novelty Hill Ranch Estates are confined to the areas almost directly above such wells, with an effective radius of about 500 feet. Applying to this testimony a margin of error of 100%, the DDES staff has proposed that Novelty Hills Ranch Estates' registered wells located within 1000 feet of any developed portion of Northridge be replaced if they show adverse impacts after site development.
74. Even so, new geologic information concerning aquifer recharge suggests at least some level of risk to Novelty Hill Ranch Estates wells. The most recent groundwater flow modeling by AESI geologists for the Vashon Advance aquifer shows (in addition to the predominant westerly movement) a northerly flow from Northridge toward Novelty Hill Ranch Estates. Moreover, although the risk that the infiltration facilities planned for the west side of Northridge will fail to recharge the portion of the advance aquifer lying beneath the Northridge commercial areas is not considered to be great, it is substantial enough to have warranted an elaborate set of monitoring and remediation conditions. In response to this information, UPD permit conditions have been modified to extend well protection provisions to all Novelty Hill Ranch Estates wells if the deep monitoring well requirement discussed below is triggered. This event would signal a potential major flaw within the hydrogeologic assumptions underlying review of Northridge. We also note that Novelty Hill Ranch Estates' location nestled among large acreage properties consisting of the Redmond Watershed Park, Blakely Ridge wetlands and Northridge commercial areas virtually assures that any well impacts experienced will be substantially attributable to Northridge development.
75. Because shallow groundwater flows are generally westerly from the western portion of Northridge, Quadrant has agreed to replace registered wells drilled into the Vashon advance aquifer that are located within 2,000 feet of the Northridge infiltration facilities, a distance equivalent to the two-year travel time of groundwater in this vicinity. This is based on the comparatively rapid travel time in this vicinity, coupled with the direction of groundwater flow. A comparable level of protection is provided for Novelty Hill Ranch Estates if the deep monitoring well requirement is triggered.

76. The City of Redmond's Well No. 5 lies approximately 3 miles southwest of the Northridge site, at a location south of Union Hill Road and east of SR 520. It is a partial source of Redmond's water supply and draws from an aquifer beneath the alluvial soils in the valley west of the Bear Creek Plateau. There is no evidence of a direct groundwater connection between this aquifer and the aquifers beneath the Northridge site. Although some groundwater from Northridge flows westerly, eventually seeps out as surface flows and infiltrates the alluvial aquifer in the valley, this represents only a small percentage of the total groundwater available in the alluvial aquifer. While Redmond offered no testimony suggesting that water from its Well No. 5 would be expected to decrease as a result of the development of Northridge (since surface base flows would increase), the City remains concerned about water quality impacts to this well resulting from development of Northridge.
77. Exhibit No. 333 submitted by Redmond shows the City's five and ten-year time of travel capture zones for Well No. 5 extending upslope into the UPD sites. But as its draft technical memorandum for the delineation of wellhead protection areas (Exhibit No. 192) indicates, these zones are merely theoretical constructs. The TWODAN model upon which the wellhead protection plan is based is only accurate for the near field, corresponding roughly to the one-year capture zone which extends to the eastern boundary of the alluvial aquifer into which the well is drilled. According to the testimony of Dr. Don Tubbs of GeoEngineers, one of Quadrant's geological consultants, the recharge rate within the alluvium itself can account for most of the water pumped at current rates by Well No. 5. Therefore, while some water undoubtedly reaches the alluvial aquifer from the Northridge uplands, the DEIS conclusion that Northridge's contribution to alluvial recharge is both small in relative quantity and fully compensated by onsite infiltration mitigation remains unchallenged.
78. While there was considerable disagreement expressed at the hearing regarding the precise makeup of the hydrogeology of the southern Bear Creek Plateau, the weight of scientific evidence indicates that there are at least four major aquifer systems that lie beneath the Union and Novelty Hill areas. In addition, there are also surficial aquifer resources lying above the till cap within Vashon recessional outwash materials which provides some base flow to local streams and wetlands as well as water to a few smaller domestic wells in the area. The shallowest aquifer beneath the till is located in the Vashon advance soils. This aquifer is thought to be generally unconfined except at some of its upper surfaces and is interbedded with silt and clay lenses. The Vashon advance aquifer provides water to a number of wells in the area. Hydrogeologists who have studied the area agree as to the existence of this aquifer, although they differ regarding its depth and relation to lower aquifers. Beneath the Vashon advance aquifer lies a layer of non-glacial Olympia sediments which creates an aquitard between the Vashon Advance and lower aquifers. Below the Olympia sediments lie the Upper Possession, Middle Possession, Lower Possession, Upper Whidbey, and Middle Whidbey layers. For our purposes the most important deep aquifer is the Middle Whidbey layer, located anywhere from near sea level to about 200 feet below sea level, into which the three UHWA wells are tapped.

79. The Union Hill Water Association has done its own hydrogeologic modeling based on the Carr report issued in January, 1993. The Carr report relies heavily on resistivity probes done in the area lying between the existing Union Hill wells and Novelty Hill Road to the north, encompassing the Northridge site. Carr's analysis projects the Union Hill primary source aquifer extending north into the Northridge site and receiving substantial recharge through a window of high transmissivity lying on the north flank of Northridge in the general area of proposed retail and commercial development. Based on maximum allowable Union Hill well pump rates, the Carr analysis projects a ten-year capture zone for the three wells which extends through Northridge into the Blakely Ridge site.
80. There are numerous points of contention between the Union Hill geologists and those for the Applicant and County Staff. The crucial points in dispute, however, concern the presence or absence of till and aquitard layers in the northern half of the Northridge site, the gradients and flow directions within the shallow Vashon Advance aquifer, and the general reliability of the competing descriptive hydrogeologic models. Based on resistivity data, Carr's model predicts both the local absence of overlying till and the nonexistence of an Olympia preglacial aquitard layer above and below respectively the Vashon advance aquifer. These conditions of high transmissivity are posited to produce an area of major recharge downward into the primary production aquifer for the Union Hill wells. Secondly, lateral flow to the east and west off of the Novelty Hill upland plateau is interpreted by Carr as producing a long and narrow northward-extending recharge area for the Union Hill wells, with water infiltrating on the upland flanks being discharged to surface drainage features rather than recharging to deep aquifers.
81. In addition to GeoEngineers, Quadrant retained a second consulting geology firm, Associated Earth Sciences (AESI), to do an independent analysis of the predicted effects of Northridge on groundwater recharge of the underlying aquifers. AESI analyzed existing and predicted surface and groundwater flows using MODFLOW, a complex finite-difference groundwater computer model that simulates flow and predicts both the flow path of water and the time it will take to travel in predicted directions. The model is three-dimensional, rather than two-dimensional, and uses six-sided cells to mimic flow conditions. Quadrant's consultant set up a grid of 9,000 cells over and under the southern Bear Creek Plateau (including the Northridge site) to test surface and groundwater flow assumptions.
82. The model was calibrated by Quadrant's consultant to known existing groundwater conditions, using well drilling logs, well monitoring data, and other available data. Recharge rates for the till and the outwash soils on the site were based on U.S. Geologic Survey studies and were integrated with the surficial geologic map for the area. A number of conservative assumptions were made that tend to overpredict the sensitivity of underlying aquifer recharge to changes on the surface resulting from development. The model was rerun when new data became available. Within reasonable limits, the MODFLOW model appears useful for predicting the comparative degree of impact that the development of Northridge is likely to have on both the Vashon advance and

the deep aquifer used by UHWA wells.

83. Some of the uncertainty surrounding the hydrogeologic projections for Northridge as it may influence recharge to the Union Hill wells was dispelled in late 1995 when four new test wells were drilled on the site. These new wells generally supported the MODFLOW analysis in that they showed that the shallow Vashon advance aquifer demonstrates a northwesterly groundwater divide across the middle of the Northridge site with a gentle gradient to the west throughout most of the proposed development area. The test wells also confirmed the location of the till layer above the Vashon aquifer and the existence of the Olympia aquitard beneath it. This information, combined with evidence demonstrating the occurrence of surface water flows from the center of the site, tends to disprove the existence of a major recharge window on the Northridge property in the location projected by Carr.
84. A second major conceptual issue of importance between the Union Hill and Applicant geologists concerns the efficacy of the infiltration systems proposed. It is generally agreed that the till layer which overlies the Vashon advance aquifer is largely absent on the west side of the Northridge site, where advance outwash soils are exposed at the surface. This exposure creates an opportunity for direct recharge of surface water drainage from developed areas into the Vashon advance aquifer. The question raised by the Union Hill testimony is whether water infiltrated on the western half of the property will effectively recharge losses experienced in the middle of the site. Union Hill's concern is that water infiltrated at this location, due to the proximity of sloped areas to the west, will tend to flow away from the uplands and not recharge the deep aquifer lying south of the site. Regarding this issue, the consensus of geologic opinion was that so long as a head is maintained within the Vashon advance aquifer below the infiltration sites, downward recharge to the deeper aquifer systems will occur even though there also may be increased lateral flows west into the surface water system. Moreover, in view of the advance aquifer's gentle gradient, if there is an actual reduction in the total amount of water available for recharge, the loss is more likely to be experienced as a reduction in lateral flows than within the downward recharge.
85. Various critics of the Applicant's hydrogeologic analysis attempted to discredit AESI's use of the MODFLOW model. In general, the criticisms focused on whether sufficient referential data existed to allow the model to be properly calibrated. These various modeling criticisms are probably valid if one assumes that the purpose of the model is to provide a definitive description of subsurface geologic reality. But the purpose of the model for the review of Northridge is merely to provide a framework for predicting site development impacts and describing appropriate forms of mitigation. Within this context the modeling data seems adequate for its purpose.
86. This matter was put into its proper perspective within the written comments of Dr. Derek Booth of the Center for Urban Water Resources Management at the University of Washington, with whom Staff contracted for an independent review of groundwater issues and data. As stated in Dr. Booth's summary review:

"None of the models that have been developed for this site are entirely accurate, and the efforts to use them to 'replicate reality' are understandable but misguided. The actual hydrogeologic system is more complex than any of the models represent, and the correspondence of model predictions with field observations does not guarantee that the model parameters have been correctly (and uniquely) constrained. Instead, the most reasonable of the models should be used more qualitatively, to suggest the type(s) and relative magnitude(s) of groundwater response to different types of anticipated change.

"Of the models presented, MODFLOW incorporates the greatest degree of realistic conditions. However, even the MODFLOW model requires a degree of characterization of the overlying aquitards that is not, and cannot be, supported by existing or readily collectible data. Assumptions about the boundaries of the pumped aquifers are also poorly constrained but undoubtedly affect the results significantly. The general characterization of flow patterns and magnitude of water-level declines shown by this model are probably reasonable; greater refinement in these estimates is **not** warranted."

87. The EIS consultants predict, and the Staff reviewers agree, that absent mitigation development of Northridge would result in about a 10% loss onsite to existing recharge. With 40% of onsite surface flows programmed for infiltration, such mitigation, if successful, should replace the natural recharge projected to be lost. The practical issues are therefore ones of assuring that the mitigation procedures are successful. Basically, there is a technical consensus that if recharge to the shallow Vashon advance outwash aquifer is maintained at current rates, recharge to the deeper aquifer should occur as a matter of course. The critical issues, in this regard, center on the question of how much of a decrease in the shallow aquifer system should be tolerated before the infiltration system is to be regarded as deficient. The Staff approach is to require monitoring of the eight onsite wells drilled into the Vashon Aquifer and to require remedial measures to the infiltration system if the average water level within the eight drops more than three feet within a two-year period after anomalies in rainfall and well pumping rates have been accounted for.
88. The Staff conditions also provide for the drilling of a deep monitoring well into the Union Hill primary production aquifer if the eight shallow monitoring wells in the Vashon Advance system decline an adjusted average of 10 feet within a two-year period. Although the Union Hill Water Association would like to see this deep test well dug immediately, the expense does not seem to be warranted unless there is some indication that the infiltration system is not obtaining the predicted results. However, we agree with Union Hill that the projected groundwater mounding beneath the infiltration facilities which would characterize the western four monitoring wells should be excluded from the calculation if the primary goal is to respond to a drastic loss of recharge in the center of the Northridge site. Therefore, for purposes of triggering the deep well requirement, only the four wells in the center of the site

should be employed in the calculation. Also, we concur with Union Hill that calibrating the effect of variations within the rainfall cycle is more reliably accomplished if a background shallow monitoring well is placed in the eastern panhandle away from all development effects. Finally, further agree that because performance of the infiltration wells is the key to the success of the mitigation system, seasonal clearing limits should also be applied within the sub-basins draining to such facilities so that sedimentation impacts may be minimized. Beyond that, while we recognize that ever more elaborate maintenance and monitoring requirements might be imposed for groundwater recharge mitigation, we find that the staff conditions are reasonable and generally adequate to accommodate predicted impacts and problems.

89. In addition to the infiltration facilities described above, Northridge proposes a number of overall features that will tend to minimize groundwater recharge loss. The first is the provision of public water and sewer systems to serve the entire site, which eliminate both the need for local water withdrawal and the disposal on-site of sewage via septic systems. Potential recharge loss is also limited by the fact that only 11% of the FCC/UPD site is proposed for impervious development, while approximately 55% of the site, comprised mainly of the NRPA in the easterly half, will be dedicated to permanent undeveloped open space.

An additional potential mitigation feature regarding groundwater recharge is the provision in the Northridge drainage design of interflow devices (*i.e.*, perforated pipes) in the outer portions of wetland buffers to increase potential infiltration in areas adjacent to wetlands. GeoEngineers consultants estimate these may result in the infiltration of approximately 18% of the surface water flowing over these areas with the other 82% becoming surface flow. However, there was little support among other geologic experts for this method as a deep aquifer recharge strategy, and as a conservative assumption, no allowance has been made for any infiltration that might result from these interflow devices in calculating groundwater recharge.

H. Water Quality.

90. The Northridge Site is relatively flat and dominated by Alderwood soils. Despite being characterized as a "low infiltration" material, Alderwood soils are capable of infiltrating up to three inches of rainfall per 24 hours. Alderwood soils also create a low risk of sediment transport during and after construction. The buffers surrounding the on-site wetlands are uniformly characterized by low slopes, "hummocky" micro-terrain, high vegetation cover, an absence of channelization, and several inches of thick rooted duff. As a result, the wetland buffers on-site maximize interflow and sheetflow return for water quality polishing, and reduce the risk of sediment transport into the wetlands proper.
91. While the site is part of the headwaters of several streams, Northridge is located some distance away from the actual streams and creeks themselves. Therefore, the site is characterized by indirect drainage paths, *e.g.*, on-site water is filtered through wetland interflow and subsurface flows before reaching area streams and surface waters. As a result, wetlands on-site perform water quality functions by

filtering, slowing, and settling particulates from water and degrading and sequestering contaminants. On-site wetlands also denitrify and temporarily reduce phosphorus releases during higher flow periods when lakes and impoundments have greater flushing rates.

92. Groundwater quality is affected by the underlying geology. Over most of the site, water must infiltrate through glacial till at the surface to enter the shallow aquifer, which itself is underlain by one or more aquitards. These aquitards are significant for water quality in that they micro-filtrate water and lengthen transit times. The majority of the water on-site moves laterally as interflow as opposed to surface flow. Under these conditions, any treated stormwater returned to the ground will not only flow in existing natural pathways to the wetlands but also will receive the benefits of interflow "treatment." The benefits of interflow are a lengthy filtration distance, travel through the rooted zone as water approaches wetlands, absorption and immobilization of phosphorus and metals by plant uptake, and ample time for degradation and filtration. Under the existing conditions on the site, it is reasonable to expect that approximately 18% of the water entering the dispersion trenches will return to the wetlands by subsurface groundwater flow, *i.e.*, interflow.
93. The MDP for Northridge includes provisions for stormwater treatment that exceed existing County requirements. Under the County's Surface Water Management Manual, the Northridge drainage system would only require wetponds sized to treat about 60% of all stormwater runoff. Quadrant, however, has agreed to comply with newly proposed amendments to the Surface Design Manual by including provisions for wet/detention ponds sized to treat approximately 90% of all on-site runoff, including provision of oil/water separators for all roadway and parking runoff collectors and high-use oil control measures as applicable.
94. During construction, best management practices and the implementation of the TЕСP will adequately protect water quality. After construction, there will be no significant probable adverse impacts to surface water with the implementation of the MDP.
95. Historically, Welcome Lake has had high phosphorus levels because the lake was created over a wetland. Since the 1980's, however, the phosphorus levels in the lake have decreased as it has become balanced with its surrounding environment. The phosphorus levels in Welcome Lake are predicted to rise only slightly with the development of Northridge because the stormwater facilities on site will trap approximately 50% of the phosphorus loads. The increased levels of phosphorus that do enter Welcome Lake should not have an impact on its eutrophic status because of the lake's high flushing rate exceeding twenty times per year.
96. There are no predicted significant adverse impacts to surface or groundwater quality, based on the mitigation required by the MDP. However, Quadrant also will be required to conduct on-site groundwater monitoring, which is designed to give two to three years advance notice of any potential adverse impact to the nearest wells based on groundwater transit time. There are no wells currently drawing within the anticipated two-year horizon for

groundwater transit in the shallow aquifer, and only two wells located within the five-year time of transit. As further insurance, in the event of adverse impacts Quadrant has agreed to replace the water source or treat water from shallow wells located within 1,000 feet of any developed portion of Northridge or within 2,000 feet of one of Northridge's infiltration facilities.

97. There is some disagreement regarding water quality impacts to UHWA's Well No. 1. Quadrant's experts presented analyses suggesting that there would be no impacts to groundwater generally and especially no impacts to groundwater drawn from deep wells located below one or more aquitards. UHWA's expert countered with an analysis stating that there would be a moderate to high water quality hazard to UHWA Well No. 1. If any risk were to exist to groundwater quality, the risk would appear first within groundwater drawn from the Vashon Advance aquifer. Therefore, the required monitoring plan for the Vashon advance aquifer should provide adequate information to determine whether groundwater located below the Advance aquifer will be affected. However, as an additional precaution, hazardous waste disposal planning will be required for some business park and retail uses.

I. Utilities.

98. Water service will be provided to the project by the City of Redmond pursuant to an executed Developer Extension Agreement between Quadrant and the City. The Redmond City Council, the King County UTRC, the King County Council, and the Washington State Department of Health have approved Redmond's water service to Northridge. Redmond will provide water to Northridge directly from the existing Seattle supply system via the Seattle Tolt Pipeline No. 1. Pursuant to the City of Seattle's water service requirements, Quadrant will establish a water conservation program for Northridge.
99. The increased demand for water relating to the development of Northridge has been incorporated into Redmond's Water System Supply Plan, the Seattle Comprehensive Water Supply Plan, and the East King County Coordinated Water System Plan ("EKCCWP"). These plans have been adopted by the respective participating jurisdictions. The provision of water service to Northridge will not have an effect on neighboring water utilities or their supplies. The water system has been sized to limit service to Northridge and Blakely Ridge. Only in emergency situations will other connections be permitted to the new system.
100. All water service facilities for Northridge have been sized in accordance with Redmond's water system design criteria. Quadrant will be responsible for all costs of extending water service facilities to serve Northridge property, but may use latecomer fees, credits, offsets, or other financing provisions authorized by law and approved by water purveyors. The total cost of extending water facilities to both the Northridge and Blakely Ridge sites may be shared by the developers.
101. Sewer service to Northridge will also be provided by Redmond. The King County Department of Metropolitan Services ("METRO") will ultimately be responsible for treating sewage flows from both projects. The City of

Redmond, King County UTRC, King County Council, and the Washington State Department of Ecology have all approved Redmond's provision of sewer service to the Northridge FCC/UPD. Redmond's criteria require that the sewer facilities be sized to serve only Northridge and Blakely Ridge and a future school site, with an additional factor of safety, but shall not accommodate other new connections. This is consistent with the 1994 Comprehensive Plan and the BCCP. The restricted size of the sewer service to the two developments will preclude new urban density development in the rural area surrounding Northridge.

102. Redmond will provide sewer service to Northridge by means of the Bear Creek Basin trunk sewer. Quadrant will share the cost of constructing the gravity fed sewer system with Port Blakely. The sewer line serving Northridge will run along Novelty Hill Road to METRO's existing trunk sewer interceptor located just west of the intersection of Union Hill Road and 178th Place N.E.
103. Unincorporated areas of King County are served by several private solid waste collection companies. Sno-King Garbage Company currently serves the Bear Creek area, with solid waste eventually deposited in the Cedar Hills Regional Landfill. Based on population projections that include the development of Northridge and Blakely Ridge, Cedar Hills has sufficient capacity to receive solid waste for at least an additional 20 to 25 years, depending on recycling rates. The options for recycling in the Bear Creek area include curbside recycling, self-haul recycling, and paper recycling. Adequate solid waste capacity exists to accommodate Northridge.
104. Puget Sound Power & Light Company ("Puget Power") provides electrical power to the Bear Creek area. Currently, there is no electrical service to the site. Northridge and Blakely Ridge will help finance new on- and off-site facilities to provide electrical service to the area, including the provision of two new substations to be located on Northridge. The substations will be screened and landscaped pursuant to the King County Zoning Code. In addition, Washington Natural Gas Company ("WNG") provides natural gas service to the Bear Creek area. WNG has an existing main running along Novelty Hill Road and will provide facilities for natural gas service to Northridge by extending existing distribution lines. GTE Northwest provides telephone service in the area. The existing remote switch serving the area has sufficient capacity to serve Northridge during its early development, and GTE will provide a new remote switch as needed.

J. Public Services.

105. Currently, police protection services to the Novelty Hill area are provided by the King County Department of Public Safety. Northridge is located within the North Precinct (No. 2) Service Area, Patrol District B4. Patrol District B4 is served by the Fall City substation located at the intersection of SR 202 and Preston-Fall City Road. The development of Northridge will result in an increased demand for police protection. To mitigate the cumulative impacts on police services related to the developments of Northridge and Blakely Ridge, a "store front" police office will be required on the Northridge site. No special police

facilities are needed if Northridge is developed and Blakely Ridge is not. The "store front" police office will be provided as part of the fire station.

106. The development of Northridge and Blakely Ridge will have an impact on King County Fire District No. 34. To mitigate these impacts the two UPD developers have entered into an agreement with District No. 34 to provide land and construction costs for a new fire station, together with required equipment, on the Northridge site. This facility is required as an MPD P-Suffix condition. In the event that Northridge is developed and Blakely Ridge is not, Quadrant will be required to provide the cost of one aid car to King County Fire District No. 34.
107. Quadrant and the Lake Washington School District have entered into an agreement for the dedication of a school site. With the dedication of this site, there will be no unmitigated impacts to schools arising from the development of Northridge and Blakely Ridge.

K. Parks, Recreation and Trails.

108. The 1989 BCCP MPD P-Suffix condition relating to parks and recreation, Section 9(g), specifically requires an MPD developer to provide parks and recreational facilities to accommodate the recreational needs generated by the MPD pursuant to King County standards. Within the current boundaries of the Northridge Site, the BCCP originally envisioned only one park and two school facilities.
109. The proposed amendments to the BCCP P-Suffix conditions would require a "variety of parks and recreational facilities to meet the needs of future residents and employees." The existing P-Suffix conditions require 25 percent of the master plan net area be provided as open space (gross area, minus all surveyed wetland areas). Northridge will exceed this standard by maintaining 48 percent of the site as open space as defined by the BCCP. Unlike the Blakely Ridge UPD, no specific park sites or acreages were identified in the BCCP for the Northridge project.
110. Application of King County Ordinance No. 3813 and Motion No. 3527 result in a requirement that Northridge provide 31 acres of park land usable for active recreation and the equivalent of 5.6 ball fields and 3 tennis facilities. The King County Parks Department has participated in the planning review of public and private park sites and facilities within Northridge, which will provide approximately 35 acres of park land, four ball fields, and three tennis facilities. Additionally, Quadrant volunteered to supply further amenities and facilities to meet the needs of the Northridge population.
111. Northridge will develop the following parks: (1) a 10-acre public park with two lighted soccer fields, playground equipment, restrooms, picnic shelter and parking facilities; (2) a 10-acre community park with two tennis courts, playground equipment, picnic area, and one other significant facility; (3) two 1.7-acre rotary parks to provide central neighborhood recreational and gathering areas; (4) a 1.5-acre grass play area within a 4.4-acre wooded parcel to allow for informal games and gatherings; (5) a 1.5-acre

- neighborhood park with playground equipment and basketball or tennis courts in the southern portion of Northridge; (6) an on-site recreational space and play area in the high-density and medium-density nodes consistent with the provisions of the King County Code; and (7) neighborhood parks within each of the medium-density residential nodes. Additionally, the Northridge Elementary School is expected to contain two recreational fields which will be available for community user groups outside of school hours.
112. John Couch, Parks Director for the City of Redmond, criticized the size and scope of the proposed Northridge park system arguing that when business park employees are factored into the use equation some 40 to 60 acres of onsite park space should be required. Mr. Couch also argued that more emphasis should be placed on active recreational facilities and the need for an administrative structure for providing organized recreational activity. He expressed a fear that at proposed levels Northridge recreational facilities would be inadequate to meet the demand generated by the project and Northridge residents and employees in large numbers would end up using Redmond facilities, including the Redmond Watershed Park.
113. There is certainly an expectation that Northridge residents and employees will make some use of the trail system within the Redmond Watershed Park. After full development the Watershed Park, Blakely Ridge and Northridge will combine to provide an extensive and interconnected trail system which will be used by residents of the two UPDs as well as by the surrounding neighborhood and the Bear Creek equestrian community. However, there is no obvious reason to suppose that the Watershed Park will receive an undue share of UPD recreational use. While adopted King County policies and regulations (including those within the Bear Creek Community Plan) with their primary emphasis on trail development do not provide a regulatory basis for requiring more extensive park and recreation facilities, Mr. Couch's criticism that the Northridge menu of options may shortchange indoor recreational needs appears to be justified. Accordingly, the range of choices available to the Applicant for a major community park amenity has been restricted to require that such amenity be an indoor facility.
114. An elaborate trail system will extend throughout Northridge to provide alternative transportation options, recreation opportunities, and connections to the existing off-site regional trail network. In total, Northridge will provide onsite approximately four miles of soft-surface and two miles of hard-surface trails. These trail facilities will be open to the public and will accommodate a variety of uses. The public trail corridors will combine with a system of internal private trails to link all neighborhoods within Northridge and provide convenient, nonmotorized access to the retail center, the business park, schools, park, and other destinations. Additionally, an extensive system of bicycle lanes and pedestrian sidewalks will be provided on all the primary streets to promote pedestrian circulation within the site. Soft-surface trails will be maintained and enhanced for hiking and equestrian use.
115. Representatives of the local equestrian community provided to the public hearing a critique of soft surface trail development proposed for the Bear Creek neighborhood, some of which does not relate directly to the Northridge

development. Judy Willman pointed out that current construction plans for Northeast 133rd Street northeast of Blakely Ridge do not include the soft surface horse trail between Bear Creek Road and 228th Avenue Northeast which was called out in the County's Nonmotorized Transportation Plan.

While this road project will serve the two proposed UPDs, it is a County CIP beyond the control of the UPD permittees.

However, County Department of Transportation staff committed themselves to an attempt to amend the CIP to provide a soft surface trail along this important system link.

116. A second issue raised by equestrian community testimony concerns the trail linkage between Blakely Ridge and Northridge along Novelty Hill Road. It appears that there is a section along Novelty Hill Road within the designated regional hard surface trail network which, due to sensitive areas constraints, is not wide enough to provide both hard surface and soft surface facilities at full widths. Although this location is on the Blakely Ridge site, Port Blakely has agreed to allow trail requirements in this area to be modified to accommodate some combination of hard and soft surface facilities to the extent feasible, and the UPD permit conditions have been amended to reflect this agreement.
117. Finally, some equestrian trail safety issues need to be clarified. First, the trail plan has been modified so that the equestrian trail located in the southeast corner of Northridge will not be required to cross a wetland upon the same bridge as the onsite minor arterial and the hard surface trail. Second, the conditions now specify that equestrian trail surfaces need to be of an all-weather design. Lastly, although not specifically requested, the trail conditions have been modified in a manner similar to the provisions for Blakely Ridge in order to require a hand-activated signal for crossing the internal north-south arterial at the time of its completion through the site south to 238th Avenue Northeast.

L. Land Use.

118. The land use regulatory framework applicable to Northridge was established within the 1994 Comprehensive Plan, which designates the project site as an Urban Growth Area, a Full Service Area, and a UPD on the land use map. Earlier, the 1989 Bear Creek Community Plan designated the site as a Master Plan Development, an Urban Activity Center and correspondingly amended the 1985 Comprehensive Plan. The 1989 Bear Creek area zoning contains over 26 pages of MPD P-suffix conditions which mandate creation of a natural resource protection area and imposition of detailed development standards. In 1991, Ordinance 10153 established the Novelty Hill MPDs as demonstration projects to evaluate measures for providing reasonably priced housing, flexible development standards and expeditious permit review processes. At that time conceptual approval was given to Blakely Ridge as an age-55 community. KCC Title 21A, the new Zoning Code initially adopted in June 1993, created special transitional provisions for conversion of the Bear Creek MPDs to a UPD approval process. Site zoning was amended to UR-P-SO in February, 1995. The new Zoning Code eliminated the need for rezoning UPD properties to urban densities and replaced the Master Plan concept with the UPD

permit.

119. Finally, in March, 1996, Ordinances 12170 and 12171 were enacted which modified the Comprehensive Plan and Zoning Code to create an overlay district for the Novelty Hill MPDs which would allow them to be approved as Fully Contained Communities consistent with the provisions of RCW 36.70A.350. This newest land use designation was created by the County Council in response to a decision of the Growth Management Hearings Board in December, 1995, which questioned whether the Novelty Hill Urban Growth Area encompassing the proposed UPDs is consistent with the Growth Management Act. New provisions added to KCC Chapter 21A.38 allow the Novelty Hill UPD properties to also apply for approval as a Fully Contained Community if they comply with a set of additional review requirements based on the provisions of RCW 36.70A.350(1). Concurrently with the adoption by the County Council of these FCC provisions, Northridge submitted an application for FCC approval.
120. Project opponents, including the Coalition for Public Trust and the City of Redmond, continue to question whether the Northridge proposal, even with the additional FCC overlay, can be approved as an Urban Growth Area consistent with GMA requirements. They argue that the UGA designation for the Novelty Hill area remains inconsistent with fundamental GMA principles as implemented by the county-wide planning policies stated in Ordinance 11446. They suggest that County housing goals can be met without the additional capacity provided by the UPDs; that satisfactory urban infrastructure and services cannot be provided to the Novelty Hill UPD area; that UPD development constitutes urban sprawl as defined under the GMA; and that under RCW 36.70A.350(2) new Fully Contained Communities can only be legally created out of areas previously designated Rural. While these issues are not trivial, they challenge the validity of the Council legislative actions which created the FCC district and overlay. As such, they are beyond the scope of this quasi-judicial review process, which necessarily assumes as a fundamental premise the validity of the adopted County policies and regulations under which it operates. Further challenges to the legality of the FCC designation in the Novelty Hill area must be brought before the Growth Management Hearings Board or the Superior Court, as appropriate. Additional discussion of the project's specific compliance with FCC approval standards will be undertaken later in the report.
121. The project elements and the permitted uses, densities and development standards are set forth in the UPD permit. The proposed uses and their respective acreages are shown on the UPD site plan and acreage chart. Northridge will provide a maximum of 1,500 housing units on approximately 238 acres of site property. In addition, it proposes 126 acres of business park, 8 acres of retail and commercial development, with 614 acres or 58% of the project site dedicated to permanent open space, including sensitive areas and active recreation facilities. Over 13 miles of trails for equestrians, pedestrians and bicyclists will be provided. The project will be developed in two divisions with the first division, Northridge North, including nearly 1,100 units of housing, the 8-acre retail area near Novelty Hill Road, and 25 acres of business park. Thirty percent (30%) of Northridge's residential units will meet affordable housing standards.

122. The current application reflects a substantial downsizing of the original 1989 proposal. In 1989 Northridge and Blakely Ridge combined proposed to develop approximately 8,600 units of housing and 200 acres of business park, with the Northridge portion of the housing inventory proposed to include over 5,000 units. The downsizing of the two UPDs since 1989 has largely been reflective of traffic capacity limits. As previously envisioned, a five lane road from Blakely Ridge through Northridge south to I-90 was part of the County's long term transportation mitigation program. This ambitious road project has been abandoned and Novelty Hill Road improvements scaled back from five lanes to the current three lane design, with the size of the UPDs reduced accordingly. In the case of Northridge this has been accomplished primarily by eliminating the eastern one-third of the total Quadrant property from the current proposal.

M. EIS Adequacy.

123. The City of Redmond has challenged the legal validity of the King County review of traffic impacts under SEPA from the standpoint of both the adequacy of the EIS discussion and the sufficiency of the mitigation proposed. On the question of EIS adequacy generally, certainly there can be no question that the EIS documents disclose, discuss and substantiate through appropriate data the transportation impacts of Northridge within the City of Redmond. The transportation study within the Draft EIS distributes trips from Northridge to ten different areas within the City of Redmond, discusses resultant traffic volumes and identifies effects to intersection levels of service. DEIS and FEIS appendices specifically analyze project impacts to 11 Redmond intersections using City of Redmond methodology, as opposed to the differing methodology authorized by King County. The City's argument must be, then, not that traffic impacts to Redmond have been ignored, but that they have been improperly characterized.
124. Redmond's primary criticism of the SEPA analysis is that the EIS study understates the number of Redmond intersections and roadways which will be impacted by the Northridge project. By way of evidence, the City has submitted its current list of mitigation projects for which it assesses pro rata share payments under SEPA authority. Any proposed development that contributes ten or more site trips to a location proposed for a City road project is required to pay a pro rata share therefor as mitigation. Based on the ten trip threshold, the City's list shows Northridge contributing ten or more trips to more than 40 traffic locations within Redmond, while the EIS analysis focuses on a dozen or so primary impact locations. Redmond notes that its ten trip threshold methodology is similar to that employed by a number of other local jurisdictions, even though it in fact has not yet been adopted by the City Council as a formal regulatory requirement.
125. Redmond further offers a critique of King County's recently adopted Integrated Transportation Program which seeks to demonstrate that such methodology is not a SEPA-based process. In particular, the City notes that both the critical link analysis and the County's Intersection Standards create a mitigation threshold which is based upon the percentage of new project traffic that passes through an

affected roadway or intersection. The critical link standard only applies to a project which contributes 30% of its zone traffic to the roadway subject to the critical link analysis, whereas the Intersection Standards only require mitigation from projects where an intersection will operate at LOS F, carry 30 project vehicles within any hour and such traffic constitutes 20% of the new project traffic in that hour. The City points out correctly that the effects of a project's traffic on an intersection or roadway will not differ depending on the percentage of the project traffic involved. Fifty trips through a particular intersection will have the same impact regardless of whether such traffic represents 1% or 90% of the project's total traffic volumes.

To the extent then that the SEPA definition of a significant adverse environmental impact is required to be based upon the absolute quantitative effects of a proposed action, it is clear that the methodology of the County's Integrated Transportation Program injects into the process factors which are not impact-based and therefore reflect policies which exist outside of SEPA authority.

126. The weakness of the City's position is that while it provides a cogent analysis of the theoretical defects of the County's traffic analysis methodology within the SEPA framework, it fails to supply an analysis which establishes the City's methodology as preferable, let alone mandatory. The ultimate question under SEPA is whether a proposed action will cause more than a moderate impact on environmental quality. The City has offered nothing to the record which suggests that a simple numerical ten-trip threshold provides a reliable indicia of significant adverse impacts. To take but one example, Redmond traffic project TFP-102 is to widen Willows Road between Northeast 116th and Northeast 124th Streets. For the year 2010 the City projects total trips of 2,968, of which Northridge will contribute 10. Based on a total project cost of \$3.2 million, Redmond requests just under \$10,000 from the Northridge developer for mitigation at this location. What Redmond has failed to provide, however, is any evidence to support a conclusion that these ten Northridge trips on Willows Road will constitute a significant adverse impact, or that there will be a significant adverse impact from the Northridge trips if the TFP-102 project is not constructed. Without this level of information, the trip data provided by Redmond by itself offers no insight into the issue of significance and is simply a pro rata fee system indistinguishable in its actual operation from that imposed by the County. While a pro rata methodology is certainly allowed under SEPA, no statute or case law requires its use, and the fundamental issue of determining significance remains unaddressed by the Redmond analysis.

127. Redmond has also challenged the adequacy of the EIS based on its distribution of trips within the boundaries of the City. The EIS used available land use assumptions described in the City's draft Comprehensive Plan, while Redmond's model has been updated to include the latest land use development information and uses a highly sophisticated 130 zone traffic grid. While we are willing to accept for purposes of argument that the current Redmond traffic distribution model provides a more intricate refinement of the movement of Northridge traffic within the City, we have seen no evidence that describes in SEPA terms the effects of this refinement. The ultimate question remains whether the EIS model has failed to identify significant adverse environmental impacts

to traffic facilities within Redmond. We have seen no evidence that the EIS model, employing the best available land use data obtainable at the time and with a ten zone traffic distribution grid for Redmond, inadequately characterizes the significant impacts of Northridge traffic on City facilities.

128. Under the rule of reason an EIS is adequate if the environmental effects of the proposed action are reasonably disclosed, discussed and substantiated by supporting opinions and data. While there is always room for argument over methodology and the need for incremental improvements to the data, the voluminous traffic discussion contained within the Northridge EIS studies with its detailed attention to Redmond impacts meets the test for overall adequacy. Given its breadth and level of detail, no basis exists to find such an EIS inadequate unless there were clear and convincing proof of actual, specific significant adverse environmental impacts which were not identified and addressed.
129. The second prong of the City's attack on the County's SEPA process for Northridge focuses on the level of mitigation payments proposed by the County conditions. The staff recommendation is for mitigation payments of \$829,000 to Redmond, with an option for their increase to a maximum of \$1.1 million if a Memorandum of Understanding can be reached between Redmond and the County Department of Transportation. The City, based on its pro rata share system with a threshold of ten site-generated trips, requests mitigation in the total amount of \$4.5 million from Northridge. As noted above in our discussion of traffic impacts, the Staff mitigation figures--whatever their ultimate merit--clearly represent the payment levels authorized by currently adopted King County standards. Such being the case, the issue here becomes one of determining whether the level of mitigation authorized by King County under its substantive SEPA authority is so woefully deficient that the Northridge project must be denied unless a substantially higher level of mitigation payment to Redmond is authorized or agreed upon.
130. There are two answers to Redmond's argument. First, as discussed above, Redmond has not established with clear and convincing evidence (or indeed any evidence at all) that its ten-trip mitigation threshold corresponds to any level of significant adverse environmental impact within the real world. In the absence of such proof, the City's \$4.5 million mitigation request based on its pro rata mitigation table cannot accurately be described as representing the cost of mitigating significant adverse environmental impacts. Second, while SEPA requires that King County take into account the extra-jurisdictional impacts of projects that it reviews, there has never been a requirement, either legislative or judicial, that every significant impact shall be mitigated or otherwise a project must be denied. While it would probably be arbitrary and capricious action for King County to systematically ignore major adverse impacts on a neighboring jurisdiction, the cases generally suggest that some level of impact creation is acceptable so long as such impacts are considered rationally within the decision-making process and balanced against anticipated project benefits. Moreover, cases also suggest that the duty to mitigate extra-jurisdictional impacts is moderated by a sense of what is possible. See, generally, Settle,

Washington State Environmental Policy Act, Section 18(c) and cases cited therein.

In this context, mitigation of Redmond impacts consistent with King County transportation standards as memorialized within a Memorandum of Understanding provides a satisfactory level of mitigation based on a rational mechanism which is responsive to identified major extrajurisdictional impacts without burdening Northridge to the point that provision of affordable housing becomes financially infeasible. As such, it is overall a reasonable process for impact mitigation and meets SEPA requirements.

131. The Union Hill Water Association has also challenged the adequacy of the EIS based on its alleged failure to satisfactorily quantify the magnitude of Northridge's impact on the primary aquifer into which the Union Hill production wells are drilled. Union Hill has particularly focused on a statement within the FEIS at page 3-1 which concludes that, "given the complexity of the southern Bear Creek Plateau's hydrogeology, the County is still uncertain about the site-specific detailed delineation of the hydrogeology underlying the site and surrounding area, and the potential for impacts from the proposal, particularly on groundwater recharge."

On this basis Union Hill argues that a deep well into the primary aquifer needs to be drilled immediately in order to provide adequate data for monitoring Northridge's impacts on its production wells, or otherwise the EIS must be found inadequate.

132. Steve Foley, the geologist who did the Staff analysis of groundwater recharge issues for the EIS, testified that the statements provided at FEIS page 3-1 were made prior to receipt of the new monitoring data provided by wells OBW 5 through 8, and after reviewing this new data, his concerns were allayed. That is to say, the new data supported the feasibility of monitoring water levels in the shallow aquifer as an indicator of the success of the infiltration facilities in maintaining deep groundwater recharge. As discussed above, the UPD permit conditions provide for drilling the deep monitoring well desired by Union Hill, but only if conditions in the shallow aquifer demonstrate a need for such further data. In addition, the EIS provides a worst case analysis based on the MODFLOW model for effects on the primary aquifer if no infiltration occurs from the Northridge facilities. Based on our previous finding that maintaining groundwater levels in the shallow Vashon advance aquifer will assure adequate recharge, we find that the EIS groundwater studies are adequate for decision-making purposes and reasonably disclose, discuss and substantiate the significant groundwater impacts of the Northridge proposal on the primary aquifer.
133. The Coalition for Public Trust also criticized the adequacy of the EIS, generally supporting the positions argued by the Union Hill Water Association and the City of Redmond. CPT also challenged the adequacy of the noise analysis within the EIS. Although the CPT analysis suggested that existing noise impacts along Bear Creek road corridors may be higher than measured by the EIS study, the general thrust of the testimony was that the County lacks regulatory authority to adequately control total traffic noise impacts. Therefore, we find that the EIS, which acknowledges that noise impact levels will be significant, contains a reasonable disclosure

and discussion of such matters.

N. Cumulative Impacts.

134. The development of the Northridge and Blakely Ridge UPDs will create joint and cumulative impacts in a number of substantive areas, as well as result in the implementation of a coordinated infrastructure system. In general, the EIS documents for the two projects contain a reasonably thorough description of the areas of cumulative impact and their potential consequences. This is particularly the case in the realms of land use, traffic, air quality, noise, and plants and animals. The analysis of joint traffic impacts is detailed and contains a number of scenarios which evaluate differing rates of development for the two UPDs in addition to the possibility that one or the other project may not be constructed. Although there will be a significant cumulative loss of upland forested habitat, the two UPDs along with the nearby Redmond Watershed Park will maintain a critical mass of linked habitat networks along wetland and stream corridors. The water and sewer systems for the two UPDs will be jointly developed as will facilities to support police and fire services. Due to the development of Blakely Ridge as an age-restricted community, joint impacts to school facilities are not anticipated.
135. Cumulative impacts have also been identified in the area of water resources, although the surface water systems for the two project sites are largely independent of one another. Much of Blakely Ridge flows east towards the Snoqualmie Valley while the portion of the Northridge site within the Snoqualmie watershed will remain undeveloped under this application. While historically there may have been linkages between the wetlands in the northeast sector of the Northridge property with those lying on the southwest portion of Blakely Ridge, construction along the joint site boundary of Novelty Hill Road and the power line easement have reduced actual hydrologic connections to a minor level. The only area in which the two projects contribute flows into the same drainage sub-basin occurs in the southwest quadrant of the Blakely Ridge property and the northwest portion of Northridge. These two sectors both contribute flows into Colin Creek and downstream to Welcome Lake. Cumulative impacts of the two projects to the Colin Creek/Welcome Lake drainage have been specifically described and analyzed within the SEPA documents.
136. Issues of joint groundwater impacts from the two UPDs remain probably the most inadequately described area of cumulative impact. The shallow residential wells of Novelty Hill Ranch Estates lie north of the Northridge property and west of the southwest corner of Blakely Ridge. Due to the low intensity of development proposed in the southwest corner of Blakely Ridge, impacts from that project to Novelty Hill Ranch Estates wells are not considered likely. Northridge, on the other hand, with its concentration of high density residential, retail and business park development adjacent to Novelty Hill Road, is capable of having larger impacts. The most recent modeling of the shallow Vashon advance aquifer by AESI suggests both the possibility of groundwater flow within the shallow aquifer from Northridge north into Novelty Hill Ranch Estates and that some of Novelty Hill Ranch Estates' shallow wells may be drawing from local perches within the advance aquifer. Accordingly, well

remediation requirements by Northridge have been extended to all Novelty Hill Ranch Estates wells if significant drawdown of the shallow aquifer results from site development.

137. Although the Northridge hearing produced a vast amount of new data and interpretation concerning site development impacts to the Union Hill production aquifer, very little of that information is useful for refining our assessment of the potential for joint impacts to Union Hill wells from the two UPDs. Even though the most intense area of site development for Blakely Ridge will lie just northeast of Northridge, AESI's MODFLOW model did not include any runs which projected loss of infiltration in this area due to Blakely Ridge development. Because of the existence of a window in the till cap on the west half of the Northridge site, installation of facilities for direct infiltration of stormwater to the shallow aquifer is feasible for Northridge and provides the only seriously analyzed strategy for recharge mitigation. Thus, the use of infiltration and dispersion trenches as a strategy for producing recharge to the shallow and lower aquifer systems, which was the mitigation centerpiece of the Blakely Ridge hearing, has been virtually ignored within the discussion of Northridge, even though such buffer trenches will be employed in Northridge as well. Typical of this dismissive treatment is the following summary comment from Dr. Booth's review of the Northridge studies:

"Dispersion of detained runoff elsewhere on the site into wetland buffers may of valuable stormwater management strategy, but it has little effect on net groundwater recharge."

138. Finally, the Blakely Ridge decision assumed that the primary production aquifer for the Union Hill wells did not extend into the Blakely Ridge site north of Novelty Hill Road. While there is no new physical data describing the hydrogeologic conditions beneath the Blakely Ridge site, AESI geologists have re-interpreted the logs for the deep monitoring well which lies on the south half of the Blakely Ridge property. AESI's interpretation is that the Blakely Ridge deep well did in fact encounter the Middle Whidbey aquifer into which the Union Hill production wells are drilled.

In short, then, the uncertainties expressed within the Blakely Ridge decision concerning cumulative groundwater impacts to the Union Hill wells remain unanswered. No new analysis of cumulative impacts has been generated, and such new information as has been adduced with respect to Blakely Ridge impacts does not dispel our reasons for concern. Under these circumstances, we find that there is neither a compelling factual basis upon which to require Blakely Ridge to contribute to the Northridge groundwater monitoring and mitigation program nor, as well, any reason to conclude that Blakely Ridge impacts to the deep aquifer system cannot occur.

IV. SPECIFIC REGULATORY FINDINGS

A. Comprehensive Plan.

139. Adoption by King County of regulations permitting Urban Planned Developments ("UPD") and Fully Contained Communities

("FCC") occurred within the same timeframe as the enactment of the 1994 Comprehensive Plan. Accordingly, there is a high level of agreement between the UPD and FCC regulations and related Comprehensive Plan policies, particularly with respect to urban growth policies. Similarly, the County's GMA-based Integrated Transportation Program is conceptually consistent with 1994 Comprehensive Plan policies for transportation.

Further discussion of specific Comprehensive Plan policies will be found within the analysis of the FCC permit application. In this regard, in addition to the policies dealing with FCCs specifically, adopted Comprehensive Plan Rural policies provide context for the evaluation of requirements for containment. Other Comprehensive Plan policies of importance are found in the housing chapter, especially at Policies H-101 through H-205, which give strong support to Northridge's proposed provision of affordable housing. Policy NE-334 is also noteworthy for its directive to protect groundwater recharge quantities in the Urban Growth Area through infiltration, where feasible.

B. Bear Creek Community Plan.

140. Northridge's compliance with the various policies contained within the Bear Creek Community Plan has been more problematic. This is due to two factors. First, the 1989 Bear Creek Plan preceded adoption of the Growth Management Act as well as enactment of all the new County Comprehensive Plan policies, development regulations, zoning requirements and sensitive areas provisions which followed on the heels of the GMA and implemented its concepts. A second source of difficulty has resulted from the level of detail provided by the Bear Creek Plan itself, which envisioned a specific development proposal for the Novelty Hill MPD area. Some of these Bear Creek Community Plan provisions have proved to be obsolete both within the context of recently adopted general policies and regulations and in the light of better technical information concerning the Novelty Hill area and resultant modifications to the UPD proposals.
141. On September 11, 1995, the King County Council adopted Ordinance 11954, which amended certain Bear Creek Community Plan policies applicable to the Novelty Hill Urban Planned Developments. Important changes were made to Community Plan Policy 4K to remove recreational facility review from a requirement to specifically comply with adopted King County park standards. More significantly, Policies 6, 6A, 6B, 6C, and 6D, which set out detailed obligatory requirements for the phased approval of urban density zoning within the Novelty Hill MPD areas, were deleted in their entirety. Also, changes were made within Policies 4M, 4N and 17 regarding UPD commercial development, as will be further discussed below.
142. With regard to the original Bear Creek Community Plan policies which remain in effect, approximately 50 provisions apply to the Northridge UPD. Most of these policy requirements are easily met by the project, but a few remain the focus of controversy and need to be specifically identified. These include Policy 4D requiring that groundwater recharge areas be identified and protected; Policies 4E and G requiring, respectively, adequate traffic impact mitigation and developer funding of needed road and

sewer facilities; Policy BC-32, requiring protection of water quality within the Bear Creek drainage system; and Policies BC-44, 45 and 45A, all dealing with traffic impacts. BC-44 requires that "when offsite road capacity cannot meet adopted standards, individual developments should be denied" until such standards can be met. Policy BC-45A allows the mitigation of traffic impacts within the City of Redmond arterial system to be accomplished through interlocal agreements. Policy BC-45A also encourages transit and ride-sharing alternatives within the Novelty Hill arterial corridor funneling into SR-520, as well as phasing of Bear Creek develop so that it is "strongly linked to the provision of adequate transportation facilities and travel demand management programs."

143. In general, the provisions of the Staff proposed UPD permit are responsive to the specific requirements of the applicable Bear Creek Community Plan policies. In those areas where the mitigation of cumulative impacts from the two UPDs consistent with Bear Creek Policy requirements is subject to doubt, a midpoint review process has been instituted to provide a check on the actual function of proposed mitigations in the areas of groundwater recharge protection, protection of Bear Creek system water quality, and road capacity and traffic impact mitigation. This process is also further discussed below.
144. The Bear Creek Area Zoning contains a detailed set of P-Suffix conditions relating to the development of the Bear Creek MPDs. Of the 150 to 200 MPD P-Suffix requirements, the proposal meets or exceeds most without any need for amendment or deletion of P-Suffix language. But there are several P-Suffix requirements with which the project, as currently proposed, cannot strictly comply. For these conditions, however, the project complies with the intent of the conditions by providing functional equivalents thereto. In response to this problem, rather than requesting an elaborate matrix of P-Suffix condition amendments, the Staff supports deleting the substantive conditions of the P-Suffix conditions and incorporating those conditions directly into Quadrant's permits. Consolidation of the permit requirements into one comprehensive document simplifies the analysis of impacts and provides for greater administrative and regulatory clarity. The process recommended herein mirrors that adopted by the County Council in the approval of the Blakely Ridge UPD application, except that the Staff recommended replacement P-suffix conditions for Northridge have been slightly amended. The amendment clarifies that traffic mitigation payments by the Applicant to the City of Redmond are governed by the provisions of the County's new transportation regulations contained in KCC Title 14.
145. There are a number of changed circumstances which warrant the revision of the P-Suffix MPD conditions. Since the adoption of the BCCP in 1989, substantial regulatory changes have occurred with the adoption of the following: (i) the Growth Management Act; (ii) the County's Surface Water Design Manual; (iii) the Sensitive Areas Ordinance; (iv) the County's Integrated Transportation Program with MPS fees, Intersection Standards and Transportation Concurrency Management; (v) King County Ordinance No. 10153, which designated the Bear Creek MPDs as demonstration projects; (vi) the Bear Creek Basin Plan; (vii) King County's new Zoning Code (Title 21A), which classified the Novelty Hill MPD sites as UPDs within a Special Overlay District;

(viii) the County-wide Planning Policies; (ix) Ordinance No. 10870, creating the UPD policies; (x) the 1994 Comprehensive Plan; (xi) Ordinance No. 11954, eliminating the phasing requirement from the BCCP; and (xii) Ordinance Nos. 12170 and 12171, designating the Bear Creek UPDs as FCCs. These changes are further discussed in the Staff Report on pages 3 and 4. These regulatory changes have dramatically altered the process and standards governing the development of Northridge.

146. Additional changed circumstances are present in the form of more accurate and elaborate site information. This information includes extensive baseline monitoring, field surveys and related information about all aspects of the proposal, including, but not limited to, wetlands and buffers, streams, ground and surface water, traffic, and other natural systems.

Northridge has also been substantially reduced in size from a proposed maximum of 5,000 to 1,500 housing units and from 2.0 million gsf to 1.6 million gsf of business park uses.

147. The impacts from these changed circumstances affect Blakely Ridge and Northridge in a manner and to a degree different from other properties in the Bear Creek Planning Area. Because the UPDs are designated for Urban development within an area otherwise zoned Rural and the site-specific P-suffix conditions focus on their Urban impacts, area rezoning is not appropriate.
148. The proposed reclassification, consisting of deletion of existing P-suffix conditions and their replacement with a generalized set of P-suffix standards plus the UPD permit, has been challenged by the Union Hill Water Association. Union Hill contends that an important level of protection to the public is lost by the conversion of detailed approval standards into permit requirements. Union Hill also questions whether anything within the roster of new policies and regulations adopted by King County since 1989 provides the level of groundwater protection afforded by existing P-suffix Condition 8-N. With respect to the first criticism, we would find some merit in Union Hill's position if there were any possibility that the current Northridge proposal could be withdrawn after approval and replaced by a different UPD application. In that instance, the loss of P-suffix approval standards could constitute a significant disadvantage because the proposed Northridge UPD permit attached hereto would have no regulatory effect on a later separate application. However, under the unique circumstances which apply to the Novelty Hill UPDs, the possibility of a later different application for a similar use does not exist. As is clearly stated within both the Bear Creek Community Plan and 1994 Comprehensive Plan policies, if the Northridge UPD application is withdrawn or denied the property automatically reverts to a Rural zoning designation.
149. With respect to the alleged impropriety of deleting P-suffix Condition 8-N, there are at least three answers to Union Hill's position. First, if one isolates the phrase within Condition 8-N reading, "no adverse impacts caused by the MPD shall be allowed to the groundwater...", as requiring a zero level of tolerance for impacts of any kind, then the condition is probably unenforceable as a regulatory taking of property. Any site development involving construction of

impervious surfaces is going to create at least some localized impact to groundwater recharge. On the other hand, a more reasonable reading of Condition 8-N views the requirement as one of avoiding significant adverse groundwater impacts, with emphasis placed on the disruption of the shallow interflow described in subparagraph 3. Based on this more defensible interpretation of Condition 8-N, it is clear that the provisions of 1994 Comprehensive Plan Policy NE-334 provide at least equivalent protection to groundwater resources. Finally, and perhaps most persuasively, the changed circumstances that are to be considered in our evaluation of whether a reclassification is appropriate are those that affect the P-suffix regulatory framework as a whole, not an item by item review of each component condition. Considering the nearly 30 pages of detailed P-suffix requirements in their entirety, our fundamental finding is that the legal and analytical framework for identifying and mitigating the environmental impacts associated with development of Northridge has been substantially replaced by the regulatory enactments identified in Finding 145.

150. The final criterion to be met is that the requested reclassification is required in the public interest. The revised conditions support the public interest by implementing both the Comprehensive Plan's designation of a UPD for the site and the policy of KCC Chapter 21A.39 favoring use of flexible standards to achieve such development at a reasonable cost. Further, the primary goals of the Bear Creek Community Plan will be promoted: high environmental protection, assurance of infrastructure concurrency, and provision of affordable housing.
151. The public interest is also promoted by the regulatory flexibility which authorizes the new technologies, models and monitoring provisions built into the UPD permit's environmental protection measures, including oversized facilities providing substantial safety factors and adjustability. An extensive monitoring and remediation plan has been adopted, with specific funding paid through both development application fees and normal property taxes after buildout. Finally, for a project which may require 15 to 20 years to complete construction, the public interest is served by summarizing all principal development requirements within a single, comprehensive, logically structured UPD permit.

C. Urban Planned Development Permit - L94UP001.

152. The King County Council adopted special provisions within the 1993 Zoning Code governing review of "Urban Planned Developments" such as Northridge. UPDs are allowed where the Comprehensive Plan designates the site Urban and a community plan establishes a special overlay zone. The Bear Creek MPDs were expressly provided the option to choose processing under the new Title 21A UPD procedures.
153. The 1993 Zoning Code's fundamental conceptual change for processing UPDs was to approve these projects by permit rather than through rezoning. The UPD permit utilizes a base zone which does not get amended. Rather, a permit is approved and a development agreement recorded which define the specific uses, densities and development standards regulating the UPD. Consequently, the "potential zoning"

system which underlies the Bear Creek Community Plan and Area Zoning has been eliminated for Northridge and other UPDs under Title 21A. The Northridge UR-P-SO base zone, which calls for a UPD overlay, was formally adopted by Ordinance 11653 on February 2, 1995. No further map amendments are required to actualize permit approval.

154. The Northridge UPD meets the specific provisions of KCC Ch. 21A.39. The property is identified as part of the Urban Growth Area under the County's 1994 Comprehensive Plan and was also designated Urban under the prior (1985) County Comprehensive Plan. The proposed UPD permit contains all of the conditions of approval required under 21A.39.030.A. The UPD permit has modified certain development standards, such as road and sensitive areas requirements, where appropriate to provide functional equivalence and still achieve County goals. The UPD permit defines a buildout period, establishes standards for subsequent permits and approvals, contains a definition of major and minor modifications and otherwise meets the provisions of 21A.39.030.B through D.

D. Fully Contained Community Permit - L96FC001.

155. As noted previously, in response to a Growth Management Hearing Board decision questioning the validity of the Novelty Hill Urban Growth Area, the King County Council in March, 1996, adopted Ordinances 12170 and 12171 authorizing an application and approval process for Fully Contained Communities in the Novelty Hill UPD area. The Northridge proposal is, then, the first application for Fully Contained Community approval in King County. It is therefore appropriate that we undertake an initial overview of the newly adopted FCC provisions. These are contained in amendments to Comprehensive Plan Policies R-104 and U-201, new plan policies U-210, U-211 and U-212, amendments to Chapters 21A.38 and 21A.39 of the Zoning Code, and Comprehensive Plan and zoning map changes implementing the overlay district.
156. The primary approval standards for an FCC application are found in Section 8 of Ordinance 12171, which adds a new section to KCC 21A.39 that largely parallels the provisions of RCW 36.70A.350(1). Section 8 spells out a list of nine specific standards that an FCC application must meet in addition to the basic requirements for a UPD. These nine standards are also found within Comprehensive Plan Policy U-212, which further contains a paragraph supplying a general definition of the term "fully contained."
157. Before looking at the nine specific FCC standards, there are some preliminary conceptual issues which need to be addressed. To begin with, there is a potential discrepancy between the Comprehensive Plan policies and the new zoning provisions as to how the FCC district subject to review ought to be geographically defined. Plan Policy U-210 states that "two sites are designated through this plan shown on the Land Use Map as a Fully Contained Community." As this policy suggests, the Novelty Hill special district is a single Fully Contained Community made up of two separate large properties. When one turns to Section 8.D of Ordinance 12171, however, this conceptual clarity becomes muddled as the ordinance grapples with the procedural issues attendant to review and approval of FCC permits on the two separate Novelty Hill sites. Section 8.D allows the two FCC

applications to be submitted and reviewed independently and also seems to suggest that the nine criteria listed under Section 8.B should only be applied to the total overlay area if requested by the two site applicants. The final sentence of Section 8.D goes on to state that "in applying the FCC criteria of Section B above to an FCC permit, the County shall consider the uses and other characteristics of any existing FCC permit on an adjoining site within the FCC area."

158. The provisions of Section 8.D need to be interpreted in a manner consistent with Comprehensive Plan Policy U-210. That is, that the Novelty Hill Special Overlay District is a single Fully Contained Community. If that overriding conceptual principle is not observed, a number of absurdities soon become apparent. First and most obviously, we are presented with the possibility of many FCCs within the same limited geographic area, each one which presumably must show full containment pursuant to the criteria of Section 8.B. Since Quadrant has split off its eastern panhandle property from the current application, if that parcel is later viewed as not having reverted to Rural status and therefore eligible for FCC treatment, presumably it would have to be reviewed as a third independent FCC. Or, if the panhandle were further divided into smaller application packages, each of them in turn would become an independent FCC. This is an untenable outcome and needs to be rejected at the outset.
159. A further absurdity of the Novelty Hill multiple FCC concept is that its essential structure and nature become entirely subject to the whim of the site applicants. By their choice to combine or not combine the two applications, the public review framework is fundamentally altered. And, if one permit application is approved prior to the other, the FCC becomes automatically expanded and redefined from the first application to the second.
160. The rational solution to the foregoing procedural quandary is to recognize that the Novelty Hill Overlay District is a single Fully Contained Community, but that at any point in time the overall structure of the FCC may be partially unknown and subject to further configuration. In the instant case, the problem is more theoretical than real. The Bear Creek Community Plan provides a framework for dealing with the Novelty Hill UPD/FCC area within a single development conceptual framework, and a UPD permit has already been approved for Blakely Ridge. While there may be important distinctions to be made between a UPD and an FCC permit, the similarities are surely more fundamental than the differences, and the Blakely Ridge UPD permit provides a substantially accurate picture of future development on that parcel even if further FCC permit review therefor becomes required. Thus, although the Northridge FCC permit application will be reviewed as a discrete land use approval, the analysis of Northridge's compliance with Fully Contained Community requirements will take into account development plans and requirements for the entire Overlay District.
161. A second conceptual discussion which may aid our review focuses on an attempt to define the ways in which a FCC approval and a UPD approval differ. After acknowledging the fact that there are large areas of overlap, the principal differences seem to be these: First, the FCC places a far

greater emphasis on transit planning. Second, the FCC defines a mix of uses (jobs, housing, services) which must be provided to site residents. Third, and most critically, the FCC imposes a requirement of impact containment which is most concretely expressed in terms of not creating conditions which induce urbanization on surrounding non-urban lands.

162. Finally, an FCC differs from a UPD in its concern with the total effect of development. If a UPD may be said to require a list of development ingredients, then a FCC suggests that there needs also to be some kind of recipe for combining the ingredients. However, this analogy should be applied with caution because the County's new FCC provisions simultaneously imply the need for overall structure while disclaiming any intent to create specific structural requirements. Thus, within the text of Policy U-212, a mix of uses must be provided, but "no particular percentage formula for the mix of uses should be required." And, further, "the term 'Fully Contained' is not intended to prohibit all interaction between a FCC and adjacent lands" nor is it "intended to mandate that all utilities and public service needed by an urban population both start and end within the property."
163. Our summary reading of these new FCC provisions is the following: The specific requirements of Ordinance 12171 Section 8.D must be met and, also, the sum total impacts of the project must reasonably meet the definition of "Fully Contained" provided at the end of Policy U-212. The definition of "Fully Contained" requires generally that the basic uses and urban services needed by the FCC resident population be provided onsite and that the urban impacts of FCC development not be unduly imposed upon adjacent properties nor operate to increase the pressures to urbanize the surrounding community. This latter requirement applies not only to limit direct offsite impacts but also to discourage creating disincentives to the continued pursuit of surrounding non-urban activities.
164. Turning now to the requirements of Section 8.D of Ordinance 12171, we find that a number of the specific FCC standards merely duplicate other existing County review provisions and need not be analyzed again in detail. Thus, the FCC requirements for new infrastructure, affordable housing, and protection for the environment, resource lands and critical areas mirror existing regulatory requirements contained in County development codes, the Bear Creek Community Plan policies and UPD approval requirements. Northridge and Blakely Ridge collectively will provide an urban level water and sewer system, appropriate fire and police facilities, an onsite urban road system plus mitigation payments to upgrade the surrounding road network. The two projects will provide a significant amount of affordable housing in an area of the County which is generally underserved in this regard and environmental protection through state of the art master drainage plans and natural resource protection areas. No issues with respect to protection of resource lands has been raised by the two applications.
165. As noted earlier within the transportation discussion, the permit requirements placed upon Northridge to facilitate transit use have been strengthened to include firm single occupancy vehicle reduction targets and clearer goals for transportation planning. These stricter requirements were a

direct consequence of the review of FCC requirements within the Northridge hearing process and constitute recognition of the more stringent standard that FCC approval imposes in this area. Imposition of the higher State Commute Trip Reduction Act targets on the Northridge project were deemed inappropriate because the level of control available to an employer-based system cannot be duplicated within the general land use context.

166. Reduction of direct urban impacts on surrounding non-urban land uses is generally achieved by the Northridge proposal through a combination of buffering and land use siting decisions. The business park is proposed to be located on the eastern half of the property where it will be buffered to the east by a major wetland system as well as the undeveloped panhandle parcel. The onsite wetland system also provides substantial buffering on the southern and western flanks of the project adjacent to offsite rural residential properties. In locations where development is proposed adjacent to offsite residential uses, a 50-foot buffer is maintained and medium density single family housing planned. The community park is also planned for the northwest corner of the site and will provide additional buffering to offsite housing to the west. Suburban residential development to the west and south will also be insulated from urban impacts by the fact that no neighborhood street connections are proposed from Northridge. The compensating impact is, of course, that large quantities of site traffic will be funneled south into the 236/238 Avenue Northeast corridor and will impose significant lifestyle changes upon existing rural residential properties in that location.
167. The area where the most significant urban use buffering issues arise is on the northern property frontage along Novelty Hill Road. On the north side of Novelty Hill Road opposite Northridge lies the Novelty Hill Ranch Estates neighborhood, a collection of large lot residential shortplats accessed by 224th Avenue Northeast. Most of the five-acre parcels within Novelty Hills Ranch Estates lie north of the Puget Power right-of-way and are sufficiently removed from Northridge as to be unlikely to experience urban noise, light or glare. However, the smaller lots south of the utility right-of-way, many of which abut Novelty Hill Road, are in a more exposed position. Most of these lots appear to be currently undeveloped, but their future viability as rural residential parcels is a legitimate concern of this FCC review.
168. As currently conceived, the development scheme proposed for Northridge along Novelty Hill Road consists of the following elements going from west to east: At the northwest corner the community park is planned, and just east of it a collector arterial will exit the site to Novelty Hill Road at a point opposite 220th Place Northeast. East of the collector arterial is Node B, which will contain medium high density residential development. East of Node B is the 8-acre retail area, which is planned to be constructed with an access driveway opposite 224th Avenue Northeast. The retail area is bounded on the east by a small wetland, and east of the wetland is a 5-1/2-acre segment of business park. Finally, east of this section of business park lies the minor arterial which is Northridge's principal site access road, followed by more business park clear to the western boundary of a major wetland system. All of the

foregoing areas except for the retail parcel are proposed to have a 50-foot perimeter buffer of native vegetation along the Novelty Hill Road frontage.

169. The primary urban/rural use conflict issues relate to the portion of the Novelty Hill Road frontage containing the principal access arterial and the retail and business park areas. Although they have expressed a preference that the retail area be located in the interior of Northridge away from Novelty Hill Road, the residents of Novelty Hill Ranch Estates have primarily joined the issue on the level of requesting greater buffering for the retail area. The Applicant originally proposed for the Novelty Hill Road retail frontage a standard commercial 10-foot landscaped buffer, Staff has proposed a 20-foot Type 2 landscaping screen, and NHRE has argued for the 50-foot undisturbed perimeter buffer requirement. In light of FCC requirements for containment onsite of urban impacts, however, the implications of this issue extend beyond the mechanics of buffer dimensions, as anticipated to some degree by NHRE residents who challenged the propriety of having a retail shopping center entrance driveway directly opposite their rural residential access road.
170. Looking at the overall Novelty Hill FCC area and taking into account the approved site plan for Blakely Ridge, what we see planned on the south half of Novelty Hill Road is over one mile of road frontage characterized by intensive urban uses. In addition to the retail business park and medium density residential uses proposed for Northridge, Blakely Ridge will add a second retail shopping center plus its own mix of high density multi-family housing. The broader question to be addressed is whether this pattern of development meets FCC requirements.
171. If one views the two UPDs in the context of surrounding uses, it becomes evident that the element of intensive urban development along Novelty Hill Road proposed for Blakely Ridge causes fewer land use conflicts than the similar uses planned for Northridge. This is because the Blakely Ridge property extends both north and south of Novelty Hill Road and therefore contains its district of intense urban development completely onsite, while for Northridge Novelty Hill Road is the boundary between Urban and Rural land use designations.
172. A second factor to be considered is the Bear Creek Community Plan and its policies and conditions, which provide us with a mixed message. As originally adopted in 1989 the Bear Creek Community Plan clearly contemplated two retail developments within the Novelty Hill Master Plan Development area, although no policy rationale is provided therefor. As stated within Policy BC-4M there would be "a community-scale shopping center and a neighborhood-scale shopping center to provide for the everyday shopping needs of the planned MPD population." This development pattern was reaffirmed within Policy BC-17, which states that "the Novelty Hill Master Plan Development Area shall contain a community center and a neighborhood center to serve the needs of future residents and employees." These two designations are represented on the land use map attached to the Bear Creek Community Plan, which shows a small neighborhood center at the northwest corner of Northridge and a larger community center on the south side of Novelty Hill Road within Blakely Ridge, as well as a mixture of business park, multi-family and office

uses along the remainder of the Novelty Hill Road frontage through the MPD properties. In an apparently contradictory mode, however, Policy BC-20 contains a pronouncement that "strip commercial development shall be prohibited."

173. The perspective of the Bear Creek Community Plan on retail development within the Novelty Hill UPD area changes within Ordinance 11954, which in August, 1995, amended a number of the community plan policies relating to MPD development. In both Policies BC-4M and BC-17 language referring to separate community and neighborhood centers was dropped. The reference in BC-4M now becomes to "a commercial center to provide for the everyday shopping needs of the planned MPD population", while BC-17 talks about "a commercial area of sufficient size to serve the needs of future residents and employees." In other words, in each case the policy reference to two separate entities has been replaced by a reference to a single retail commercial facility for the entire Novelty Hill area. These policy changes, when considered in the context of newly adopted FCC containment requirements and the existing Bear Creek policy prohibiting strip commercial development, present a strong regulatory case for the proposition that the Northridge retail area should either be deleted or relegated to an interior site location where its offsite impacts can be minimized.
174. In light of the foregoing, at the very least the Northridge retail area needs to be set back and buffered sufficiently to avoid creating land use conflicts and urbanizing pressures on adjacent rural residential properties to the north. This means that Quadrant's quite understandable desire to maximize highway pass-by retail exposure along Novelty Hill Road cannot be accorded weight in the decision-making process. Our minimum recommendation is for retention of a 100-foot native vegetation buffer along Novelty Hill Road adjacent to the retail tract. While 50-foot vegetated buffers may serve adequately next to residential areas and low density business parks, they are unlikely to survive the pressures of adjacent retail parking lots and merchants who have a vested interest in making them disappear. We recognize that this requirement may result in the retail area being downsized or growing at a pace more in step with surrounding UPD/FCC residential and business park development. While this may be unattractive to the developer, it is more in keeping with the containment goals of the FCC designation and with recently revised BCCP policies.
175. In the alternative, the Northridge site design provides opportunities for reconfiguration in ways which may both serve the interests of the developer and the offsite community consistent with FCC requirements. We note that conceptually there is no compelling logic behind the proposed location of the 10-acre public park, which is to be sited on the east side of the principal Northridge access arterial in the middle of a business park area. Other than the fact that the site appears to be flat and unconstrained, no evident purpose is served by placing the park in this location. If it were moved to Novelty Hill Road and the location presently designated for the retail tract and Node B, and the retail site removed inland to Node A, a number of benefits might be realized. First, the park would be more accessible to the community at large, especially the onsite higher density residential areas. Second, placement of the park on Novelty Hill Road would eliminate the need

for any kind of screening buffer, and the retail area, though set back behind the park, would still lie within the territorial view of Novelty Hill Road traffic. Third, this rearrangement would free up ten acres on the east side of the principal access arterial and permit consolidation of business park development, allowing the two isolated pods of business park west of the access arterial to be replaced with higher density housing. While there may be practical objections to this reconfiguration which are not apparent on a conceptual level, the option to make such a redesign as an authorized permit modification has been added to the proposed conditions.

176. The FCC requirement for a mix of uses offering jobs, housing and services to the residents of the new community has also generated lively debate within the public hearing. Questions were raised as to whether the number of jobs created in the FCC ought to be in some way proportional to the estimated working population of the residential community. In a similar manner, the hearing discussion considered whether there ought to be some form of required phasing of business park and residential development so that jobs and housing are offered in a coordinated fashion. If such requirements were imposed, it is surmised that significant benefits could be achieved in reducing offsite automobile trips. In addition, the City of Redmond questioned the floor area ratio assumptions underlying business park development and resultant EIS projections of Northridge employee populations. Redmond planners testified that realistic floor area ratios could generate an employment population two or three times greater than the 3,750 workers projected by the EIS and urged a permit condition limiting business park development to a maximum of 50 acres.
177. Quadrant's representatives argued vigorously against either a reduction in business park acreage or any phasing linkage between business park and residential development. On the former issue their contention was that historically 90 to 100 usable acres has been demonstrated to be a minimum critical mass for viable business park development. On the second issue they testified that business park development is almost entirely market-driven, and its viability is compromised if constrained by nonmarket factors. In general, we find Quadrant's arguments persuasive, especially in view of the provision of Ordinance No. 12171, Section 8.B, which states that "no particular percentage formula for the mix of uses is required." We also find that Blakely Ridge is a potential source of housing stock for Northridge business park employees, even though Blakely Ridge is an age-restricted community. The Blakely Ridge requirement is that one member of each household shall be age 55 or older. While no doubt there will be many retirees at Blakely Ridge, there will also be residents within the 55-65 age group as well as younger spouses who will be within the available work force.
178. The record provides no compelling basis for resolving the dispute over business park floor area ratios, and in view of the Ordinance language cited above rejecting the imposition of specific percentage formulas on the FCC use mix, we are inclined to regard the importance of this data uncertainty issue in terms of potential traffic impacts. The primary consequence of concern to the review of Northridge resulting from an understatement of business park employment

populations will be in the realm of traffic trip generation.

This uncertainty is therefore best understood as a further rationale for later re-evaluation of traffic impacts within the midpoint review process.

179. The FCC requirement that there exist development regulations to ensure that urban growth will not occur in adjacent non-urban areas, which shall include appropriate zoning and permit restrictions on the sizing of water and sewer systems and future connections thereto, is clearly met by the Northridge application. No further urban development can be permitted in the Novelty Hill or Bear Creek areas without a modification of the County's Urban Growth boundary. Surrounding areas have all been downzoned to a lower density rural standard. Appropriate water and sewer sizing restrictions are in place. Consistent with the GMA regulatory framework, no further urban growth in the Novelty Hill area is permitted to occur.
180. A further FCC issue raised by Redmond relating both to containment of urban impacts and the mix of onsite commercial uses centers on the land use tables contained in Attachment 4 to the UPD permit. Note #8 to the retail use table suggests that up to 10% of the gross floor area within the business park may be devoted to retail uses and allows the 10% limit to be exceeded as a minor permit modification. Redmond complained that the terms governing this 10% provision create a loophole by which the business park could be converted piecemeal to a retail shopping center. The revised Staff UPD permit language attempts to close this loophole by restricting any proposed concentration of retail uses within the business park and by making requests to exceed the 10% retail limit a major rather than a minor permit modification. We have recommended further restrictive language which applies the 10% retail limit to the floor area of each business park building (except gas stations) and requires that retail uses within the business park be set back at least 400 feet from Novelty Hill Road in order to avoid conflicts with offsite rural uses.
181. If the foregoing modifications are implemented, the Northridge proposal meets both the individual standards for approval as a Fully Contained Community and, as well, the overall goal of reasonable total containment of urban uses and impacts. The critical factors in the successful implementation of a Fully Contained Community within the Novelty Hill overlay district will be Northridge's ability to limit urban land use impacts along those portions of the Novelty Hill Road corridor which border on rural areas and to adequately mitigate traffic impacts. In addition to the site buffering discussed above, the FCC/UPD permit requires an elaborate complex of traffic mitigations, including an aggressive transit planning program, and provides through the midpoint review process an opportunity to evaluate actual impacts and make any adjustments which may be necessary to comply with FCC requirements.

E. Preliminary Plat - L95P0005.

182. The preliminary plat application for Northridge North will subdivide 807 acres to create 896 lots, which will provide approximately 1,083 dwelling units. The preliminary plat is consistent with the UPD development standards, including the permitted uses and densities set forth in the UPD permit.

183. The City of Redmond argues that the preliminary plat should be denied because it fails to make appropriate provision for streets, parks and recreation, drainage, and water supplies, and fails to serve the public use and interest. The substantive issues raised by Redmond have been discussed in earlier sections of this report, and Northridge has been found to be in compliance with applicable county standards and policies. It follows, therefore, that the Northridge North preliminary plat application meets state subdivision requirements.
184. The Northridge North plat makes appropriate provision for the public health, safety and general welfare, and for open spaces, drainage ways, streets and roads, alleys, public ways, transit stops, potable water supplies, sanitary waste, parks and recreation, and all other elements required for preliminary approval pursuant to RCW 58.17.110.

F. Road Vacation - V-2270.

185. Quadrant has petitioned to vacate a portion of G.M. Bowman Road (County Road No. 119) and C. Robstad Road (County Road No. 555), both lying south of Novelty Hill Road on the Quadrant property. The Department of Public Works and the County Engineer have recommended that these roads be vacated, and have stated that the County has received the required administrative fee.
186. There is no evidence that the proposed vacation areas were ever deeded to the public for road purposes. However, residents in the area testified in the Blakely Ridge hearing to the fact that Northridge roads were used by the public until the late 1930's. There is no evidence that public funds have ever been expended to acquire, improve, or maintain either Bowman Road or Robstad Road. Furthermore, no easements are required by any utility. The County considers these roads as useless as part of the County road system, and their vacation would benefit the public by returning the unused area to the public tax rolls.

V. MIDPOINT REVIEW

187. The Blakely Ridge UPD permit applies to the two UPDs jointly a requirement for a midpoint review to consider the cumulative impacts of Northridge and Blakely Ridge, both generally and in three specific areas: traffic, groundwater impacts to area wells, and water quality impacts to Welcome Lake. As recited within the Blakely Ridge report, this midpoint review process was found to be necessary because uncertainties within the technical data allow the possibility of cumulative potential impacts at unacceptable levels and important substantive areas exist where cumulative impact analysis was not done on a meaningful level. These deficiencies result in the need for a mechanism for cumulative impact analysis and mitigation. The Blakely Ridge report also identified Bear Creek Community Plan policies for which compliance could not be assured without a process for comparing actual UPD performance with applicable standards. In addition, the report noted that a second opportunity for meaningful public review was widely understood by Bear Creek residents as a negotiated element of the compromise reached in 1989 when

the Bear Creek Community Plan was adopted, creating the Novelty MPD Urban designation and downzoning surrounding rural properties. As stipulated by the parties, to facilitate consideration of cumulative impacts the Blakely Ridge record has been incorporated by reference within this Northridge permit review proceeding.

188. The midpoint review process continues to be opposed by the two UPD developers for many of the same reasons which were argued within the Blakely Ridge appeal. The fundamental question to be addressed at this point is whether new information generated by the Northridge hearings provides a satisfactory basis for concluding that the cumulative impact concerns identified during the Blakely Ridge review process are no longer substantial. Our review suggests that serious issues of cumulative impact analysis yet remain.
189. In the area of traffic impacts the Northridge hearing has, if anything, simply underscored the debatable and somewhat arbitrary nature of the technical assumptions which underlie trip distribution methodology. While we declined to substitute Redmond's methodology for that employed in the EIS, we are constrained to point out that Redmond's trip distribution assumptions are generally as defensible as those made by the Transpo Group within the EIS study. Trip distribution figures are ultimately predictions about patterns of human behavior and, as such, are probably always subject to argument. Here, also, the sheer complexity of the relevant transportation network combined with unavoidable uncertainties about the construction schedule for both the two UPDs and critical public road projects serving the area interjects a speculative element into the process which cannot be eliminated through further refinements in traffic data.
190. Moreover, the testimony of Redmond's witnesses also raised serious questions about the reliability of the employee population figures for the Northridge business park. If business park employment figures prove to be far higher than projected within the EIS, traffic impacts also will be significantly increased. In addition, the imposition within the Northridge permit of specific traffic reduction goals pursuant to transit management planning strategies supports the need for the midpoint review process. On the other hand, we agree with Port Blakely that the traffic Memorandum of Understanding with Redmond precludes the imposition of additional mitigation requirements on Blakely Ridge for Redmond impacts and that the midpoint review procedure should reflect this fact.
191. With respect to groundwater impacts, no new attempt was made during review of Northridge to model the cumulative impacts of Blakely Ridge and Northridge development on groundwater recharge to the Union Hill primary aquifer. In addition, the AESI geologists have reinterpreted the deep well data for the Blakely Ridge site as encountering the Middle Whidbey aquifer, and hydrogeologic testimony generally minimized or dismissed the importance to deep aquifer recharge of wetland buffer infiltration efforts. With respect to the wells within Novelty Hill Ranch Estates, as previously noted the most recent AESI flow models show groundwater moving within the shallow advance aquifer from the commercially developed portions of Northridge into Novelty Hill Ranch Estates. Finally, the fact that conditions of mitigation will be imposed under the UPD

permit to remedy potential impacts to the Union Hill production aquifer and to offsite shallow wells does not obviate the need to consider whether such mitigations in fact prove to be adequate. On the other hand, no evidence has been introduced indicating potential Northridge impacts to the Dawnbreaker Well, and this facility may be excluded from cumulative impact review.

192. With respect to water quality impacts to Welcome Lake, the agreement of the UPD developers to participate in a lake management district provides an option for mitigation but no guarantee of its success. The district may never be formed, and performance standards for its function have yet to be determined.
193. The Northridge developer has raised questions concerning the regulatory authority underlying the midpoint review process. While we believe an argument for a SEPA basis can be made, primary authority for the midpoint review is found within the provisions of KCC 21A.39 and the substantive provisions of the Bear Creek Community Plan for groundwater recharge protection, protection of Bear Creek system water quality, and road capacity and traffic impact mitigation. KCC 21A.39.030.A authorizes UPD project phasing, and KCC 21A.39.030.C allows application of subsequently adopted standards where the UPD permit specifies a time period or phase for such implementation. The midpoint review process, then, is a limited form of project phasing designed to achieve the goals of the Bear Creek Community Plan policies and which allows for the imposition of new conditions or requirements if impacts in excess of initial projections are encountered or proposed mitigation measures are insufficient.

We agree with the Applicant, however, that UPD plats which are finally recorded within 60 months of preliminary approval should be considered vested against the imposition of new development conditions or requirements consistent with state law to the extent that infrastructure improvements have been actually constructed during the plat approval period. Plat extensions beyond 60 months are entirely discretionary approvals, and no vesting rights apply to them. The midpoint review procedures have been modified to reflect vesting requirements.

194. We also agree with the UPD Applicant that impact mitigation or remediation through the midpoint review process should only require the replacement or retrofitting of existing facilities as a last resort based upon a finding that needed impact mitigation cannot otherwise be accomplished. In addition, we concur that more stringent performance standards should not be imposed on a UPD at midpoint review unless there is a specific finding that impact levels thought to be acceptable at the time of UPD approval are now deemed to be significantly adverse. Moreover, we agree categorically that a more stringent level of service standard for traffic impacts should not be imposed through the midpoint review procedure.
195. Contrary to the view of the UPD Applicants, examination of traffic impacts through the midpoint review procedure is not inconsistent with the County's Integrated Transportation Program adopted under authority of Ordinance 11617. First, substantive authority for midpoint traffic review is found within the policies of the Bear Creek Community Plan, not

Ordinance 11617, nor does the ITP ordinance presume to supersede applicable community plan policies. Second, Section 29 of Ordinance 11617 makes the issuance of a traffic concurrency certificate subject to the hearing review process. Third, a moratorium in the issuance of building certificates for the UPD based on midpoint review would not have the legal effect of revoking the project's traffic concurrency approval. Accordingly, there is no logic to the argument that a UPD's reserved road capacity under its concurrency certificate would be usurped by other developments.

196. In like manner, the so-called "fourth trigger" stated on page E-6 within the Blakely Ridge Transportation Mitigation Program, which requires cessation of UPD construction pending further mitigation if the 1,350 vehicle per hour level is reached on Novelty Hill Road after construction of traffic projects C and D, neither has the effect of cancelling a transportation concurrency certificate nor does it violate concurrency because it fails to employ the 1.1 V/C ratio stated in Ordinance 11617. The 1.1 V/C ratio is a theoretical construct which allows identified critical link roadway sections to accommodate new developments up to a projected level of 110% of road capacity. The extra 10%, as explained by Transportation Planning Manager Bill Hoffman, is an adjustment to reflect the fact that some previously approved pipeline projects in fact will not be built. The actual capacity of a road is obviously never more than 100%, and because the E-6 trigger is based on actual traffic counts and not pipeline approval projections, use of a 10% over capacity figure would create a trigger based on a physical impossibility. As pointed out by Redmond traffic consultant Terry Gibson, the real problem with the 1,350 VPH trigger is that it may be too high, and actual gridlock may be reached before the 1,350 figure is attained. Accordingly, the Attachment E-6 requirements have been modified to allow the 1,350 VPH figure to be modified based on the actual capacity of the roadway. Further, the fourth trigger language in E-6 has been amended as proposed by Blakely Ridge to provide that the requirement for new mitigation is satisfied by the existence of an approved CIP for Novelty Hill Road improvements.
197. There has also been considerable debate over the procedural framework that the midpoint review process ought to follow. A primary concern motivating the Staff recommendation was to avoid duplicative reviews within a short timeframe, recognizing the fact that a public hearing process will be required for approval of the Northridge South preliminary plat. The initial Staff proposal was to prohibit the Northridge South application from being filed until a minimum of 500 dwelling units had been issued permits within Northridge North, then combine the Northridge South and midpoint review processes. Under this approach, the midpoint review for Blakely Ridge and Northridge became separate procedures, each appealable through the Hearing Examiner to the County Council.
198. We are sympathetic to the efficiency goals being promoted by Staff and acknowledge that there are a wide array of procedural options which conceivably could be employed to attain the goals of the midpoint review process. However, we are reluctant to tie the midpoint review process to the Northridge South hearing. If development of Blakely Ridge were to become delayed, midpoint review could be required

under the Staff proposal at a point where 500 permits had been issued for Northridge North but no cumulative impacts had occurred. While we would agree that consolidation of the Northridge South and midpoint review processes is a laudable goal, assurance that the midpoint review will perform a useful function requires that it be independently defined as to its occurrence. This does not preclude the possibility that other review procedures may be consolidated with it. We reject the idea of separate midpoint reviews for the two UPDs on the grounds that one of the fundamental purposes of the procedure is to allow the impacts of both UPDs to be considered together within a single analytical framework.

199. We agree with the Blakely Ridge Applicant that the midpoint review process is facilitated by assuring that provisions exist within the two UPD permits which create comparable UPD approval periods. Because the UPD approval period for Northridge has been expanded to 15 years with an option for a five-year renewal, the same terms ought to apply to Blakely Ridge. The midpoint review provision within the Blakely Ridge permit which allows its terms to be modified via the Northridge permit provides authority to conform the Blakely Ridge term to the 15 year Northridge standard. Also, as requested by the Blakely Ridge Applicant, we make a finding that Ordinance 12195, adopted April 1, 1996, amends KCC Title 19 to authorize the type of extensions of preliminary plat approval described within Section 3.6 of the Blakely Ridge UPD permit.

CONCLUSIONS:

1. Adequate legal notice meeting the requirements of King County ordinances and constitutional due process was provided for the public hearings held on the applications for a Northridge FCC/UPD permit, preliminary plat approval, road vacation, and amendments to the Bear Creek Area Zoning P-Suffix conditions.
2. EIS adequacy is based upon the "rule of reason," which requires that an EIS present the decision-maker with a "reasonably thorough discussion of the significant aspects of the probable environmental consequences" of the agency's decision. *Klickitat County Citizens Against Imported Waste v. Klickitat County*, 122 Wn.2d 619, 633, 860 P.2d 390 (1993), quoting *Cheney v. City of Mountlake Terrace*, 87 Wn.2d 338, 334-45, 552 P.2d 184 (1976). The King County Code and the SEPA rules accord substantial weight to the determination of the responsible SEPA official as to EIS adequacy and general compliance with SEPA requirements. "Although the question of EIS adequacy is one of law . . . , the decision of the agency relative to the adequacy of the EIS is 'accorded substantial weight.' RCW 43.21C.090." *Mentor v. Kitsap County*, 22 Wn. App. 285, 289, 588 P.2d 1226 (1978).
3. Under the rule of reason, the Northridge EIS is adequate. The EIS satisfies all SEPA requirements and it discloses, discusses and substantiates all the reasonably probable impacts to the environment. The EIS is based on exhaustive environmental analysis and is supported by extensive professional research. The fact that some of the information contained in the EIS may be subject to dispute or contradiction by other expert opinions does not imply

that the SEPA documents are inadequate. The Northridge EIS documents contain a reasonably thorough discussion of the significant aspects of the probable environmental consequences of the proposal which is adequate overall to provide the information necessary to make reasoned decisions concerning the applications under review. The EIS alternatives are reasonable and appropriate.

4. The adverse impacts of the Northridge proposal on the natural and built environments, if mitigated and monitored, can be reduced to a level compatible with adopted King County policies and standards and will not unreasonably burden surrounding residents.
5. Adequate provisions have been made for providing water and sewer services to the Northridge project.
6. The Applicant has demonstrated that since 1989 conditions and circumstances affecting the subject property have undergone substantial and material changes not anticipated by the BCCP and area zoning. Accordingly, the proposed reclassification, comprising a deletion of P-Suffix conditions regulating MPD development on the property and their substantial transference to the UPD permit, is in the public interest because it promotes the comprehensive and efficient evaluation of the project proposal, as recently revised, according to currently adopted standards and in the light of greatly expanded site information.
7. The Northridge proposal meets the requirements stated at KCC 21A.38.080 for the implementation of the UPD designation because the UPD permit application encompasses more than 200 acres of contiguous land under one ownership and the UPD approval will comply with the standards and procedures set out in KCC Chapter 21A.39. The Northridge UPD permit establishes minimum conditions of approval which meet the requirements stated at KCC21A.39.030.A.
8. The Northridge proposal also meets the requirements of Ordinance No. 12171 for approval as an FCC. Northridge satisfies the requirements of new infrastructure, transit-oriented site planning, buffers, a mix of uses, affordable housing, environmental protection, urban growth, designated land protection, and critical area protection. Further, as conditioned, the proposal will fully contain the impacts of urban development.
9. If approved subject to the conditions contained within the UPD permit recommended herein, the preliminary plat application for Northridge North make appropriate provision for the public health, safety and welfare; serves the public use and interest; and meets the requirements of RCW 58.17.110.
10. G.M. Bowman Road and C. Robstad Road are useless roads in the King County road system, and the public will be benefited by their vacation. The compensation required by law to be paid as a condition precedent to the vacation of these roads has been deposited with King County, and no easements are necessary for the construction, repair and maintenance of public utilities and services.
11. The conditions of approval recommended herein and within the attached UPD permit, including dedications and easements, will provide improvements which promote legitimate public

purposes; are necessary to serve the project and are proportional to its impact; are required to make the proposal reasonably compatible with the environment; and will carry out applicable state laws and regulations, and the laws, policies, and objectives of King County.

RECOMMENDATIONS:

A. Bear Creek Area Zoning.

APPROVE the proposed amendments to Ordinance No. 8846 and KCC 20.12.170 contained in Proposed Ordinance No. 96-329, as amended by Exhibit No. 321.

B. UPD AND FCC PERMITS.

APPROVE the UPD and FCC permit attached hereto subject to the Applicant's compliance with all its terms, standards and conditions and subject to the following further conditions:

1. Within 60 days of Council approval, the permit conditions for the UPD/FCC will be revised to incorporate any changes made by the Council.
2. A development agreement signed by the King County Executive and Quadrant Corporation shall be executed binding the Applicant and its successors in interest to participate in the development of the property only in accordance with the conditions of the UPD/Fcc permit. The development agreement shall be recorded with the King County Division of Records, with the revised UPD/FCC permit conditions described in Item 1, above, attached.
3. The Northridge UPD permit and FCC permit will become effective simultaneously with the recording of the Development Agreement.

C. NORTHRIDGE NORTH SUBDIVISION.

APPROVE the preliminary plat for Northridge North as shown in Attachment 2 of the Department of Development and Environmental Services, Land Use Services Division's Preliminary Report to the Hearing Examiner for the April 29, 1996, public hearing, subject to the following conditions of final approval:

1. The preliminary plat approval shall not become effective until recording of the UPD/FCC development agreement.
2. The Applicant shall comply with all platting provisions of KCC Title 19.
3. All persons having an ownership interest in the subject property shall sign on the face of the final plat a dedication which includes the language set forth in King County Council Motion No. 5952.
4. The number of lots and density within each division shall be consistent with the conditions found in Sections 1.3.1 of the UPD/FCC permit.
5. The Applicant shall obtain final approval from the King County Health Department.
6. The Applicant shall obtain approval from the King County Fire Protection Engineer certifying the adequacy of the fire hydrant, water main, and fire flow to meet the standards of KCC 17.08.
7. A legally binding agreement or covenant between the UPD/FCC developer, the County, and the homebuilder will be recorded prior to any final plat approval that includes lots or multi-family parcels where affordable housing will be built. This condition shall be carried out consistent with UPD/FCC permit Section 1.4.
8. The first final plat shall include the entire Northridge North property. The areas designated as NRPA protection areas and perimeter buffers shall be identified as such with the required limitations and restrictions for development shown on the face of the plat. Future replatting of development areas, including establishment of lot lines and road dedication, may allow minor changes in these areas without requiring a plat alteration. Roads, parcels, detention facilities, and lots which are neither proposed for development nor critical to support development within the first plat are not required to be dedicated, designed, bonded, or constructed at the first plat recording.
9. Upon recording the first final plat, Northridge shall convey a temporary public easement for trail use in the Bowman Road area which shall automatically be vacated when an alternative public trail route is created.
10. All terms and conditions of the Northridge UPD/FCC permit shall also be terms and conditions of the subdivision approval.
11. Parcel 20, shown as future development, will be created

as a tract within Northridge North. This parcel is appropriate for residential development and other uses authorized by the UPD/FCC permit. The specific terms of development within this tract will be addressed in the Northridge South environmental review and development conditions. This will include hydrologic analysis warranted by any departure from the MDP modeling assumptions.

12. All planter strips, medians, and cul de sac bulb landscaping shall be maintained by the Northridge Homeowners' Association.

D. ROAD VACATIONS.

APPROVE the proposed vacation for those portions of Bowman and C. Robstad Roads lying on the Northridge site; provided that, in the event that the Northridge UPD is denied, the road vacation also should be denied.

RECOMMENDED this 27th day of June, 1996.

Stafford L. Smith
Deputy Hearing Examiner

TRANSMITTED this 27th day of June, 1996, to the following parties and interested persons:

Joyce Adachi-Kirkland
John Adams
Marilyn/Norris Adams
Mary Ann/Douglas Adams
AGI/Tom Meyer
Anne Alberg
Mark Rubbert/Teresa
Alexander
Sue Alfieri
Sue Algaze
Lisa Allen
Bonnie Altenburg
David/Janette Anderson
Gary/Sally Anderson
Krista Anderson
Richard Anderson
Rebecca Anderson
Aqua Terra/Douglas
Beyerlein
Tom Armstrong
Glenn/Betty Armstrong
Dave/Bobbie Arnold
Associated Earth Sciences/C
Koger
Associated Earth Sciences/L
Lepp
William Backlund
James Bailey
Eric Baker
C. Fielder/D. Ball
Mike A. Ball
Sue Balsiger
David Barash
James Houston Barclay
Carol Barmore
Rosetta Barmore
Sanford H. Barnes
Julie Barnfather
Douglas J. Barovsky
Jeffrey Barrett
Danny/Karen Barrett
Dan Basica
Rita/Gary Bass
Levi Bateson
Charles C. Baumgarl
Greg Bawden
Lareen Beacham
Major Jackson Beard
Helen W. Beazley
Gina Beck

Vicki/Robert Becker
Barbara Beeson
Robert Belker
Lorren Bell
Tom/Regina Bell
Thelma Benson
Carol Berdan
Berk & Associates
Don/Connie Berkowitz
Liz Bernberg
Tamara Bernstein
Louis/Barbara Bernstein
John W. Betzoff
Jordan Bigel
Art/Lois Birchler
Janet Bishop
Jay Blish
Lucas/Dina de Bly
Suzzane de Bly
Cleo Bloomquist
Steve Boekenooen
Brenda Bole
Taree Bollinger
Tom Boriotti
Leo Bot
Arvey Bowes
Charles/Kelly Boyd
Brenda Brask
Monica Brindley
David Brodie
Martha Broekhof
John Brookman
Keith Brooks
John Browne
Dural Browning
Jerie Broze
Jackie/Karl Buhl
Glenys Buhrmann
Richard Buikema
William Bullock
Sarah Burgess
Gary Burnett
Ron Butler
Tanya/Tom Button
Gordon Byrd
Joan Cabreza
Jean Caldwell
Regina/Christopher Cale
John/Charlotte Campanella
Patricia L. Carey

Dave Carlton
Charles Carpp
Curtis/Kathy Carpp
James R. Carr
Debra L. Carroll
Neville Gordon Carrou
Randy P. Carsch
Kevin Casye
Kevin/Kathleen Casey
Christine Chai
Liz Chalmers
Lydia Chan
Linda Chapman
Sue/Dave Chenault
Kenneth D. Christensen
Terry/Heather Chubb
Molly Ciliberti
Robert E. Clapp
Karen Clarke
Lynda/Tom Clements
Laura Coates
Phil Cohen
Denise Cole
Donald Coleman
Sam Colgan
Kris Colt
Bobbie Jo Connors
Pat/Pamels Cooney
Susan J. Cooper
Dona Cooper
Frank J. Cospito
Rich Costanza
Michael/Rita Costello
Jon Cott
Jake Couch
Suzy/Mike Coury
Laura Beth Coutts
Diane Cowger
Heidi/Thomas Cox
Audrey Crawford
Phil Croom
Janice/David Crotty
Gerry/Sigrid Cutler
Ann Daigle
Karen/Robert Dalziel
Allen Day
Michael DeAngelo
Steve Dearden
Alex Demczuk
Antonia Dewees

Lisa/John DiBartolomeo
Brian Dillon
Marilyn Doke
Nancy L. Donham
Wende/James Doohan
Gretchen Dours
Kristin Doyle
Gale Dukane
Dan Dunavant
Terral Dunn
Janice L. Dupler
Scott Dutro
Charles/Cynthia Edin
K. Egan
Richard/Sandra Egger
Joseph Elfelt
Lynne Elfendahl
Lloyd/Shirley Ellingson
Len Elliott
Bill Elliott
Julia/Mike Ellis
Ken Engel
Larry Engel
Environalysis
Ruby Erven
Gena Etherton
Jeffrey Eustis
Scott Everson
Giovanni Fagioli
Jerry Fahin
Joanne Farmer
Jim/Judy Fasano
Mr./Mrs. Lee Fellhauer
Paul Fendt
Robert B. Filley
Sandra K. Fischer-Ron
Cathy J. Fisher
Michael/Kristi Fisher
Lisa Fite
Joan Fleming
Mary Francis
Lynn Frankovich
Carol/Norbert O. Fratt
David Frederick
Mark Friedland
Marilyn Frost
Jason Fuller
Carl Gaddis
Steven Galipeau
Greg Galloway
Keith Galpin
Janis Gane
Jim Gannett
Jim Gaudette
Ann Marie Gaven
Claudia/Russell George
Gene Gilertson
Rod Gilkison
Lauren Gisle
GeoEngineers
Cherlye Golding
Jay Goldman
Hugh Goldsmith
Dana Good
John Goodfellow
Shannon Gordon
Diane C. Gordon
Neville Gordon-Carroll
Becky Grange
Mark Greengo
Robert Gregg
Scott Gremmert
Larry Grimm
Matthew Grogan
Dahlin Group
Denise Gwinn
Eric Haas
Nancy/James Haas
Cheryl/David Hadley
Ruthanne/Chandler Haight
Bob Hails
Doug Hakala
Toni Haley
Camden Hall
Linda Hamm
Louis Hammer
Gary Hammon
Cynthia A. Hansen
City of Redmond/John Haney
Brian/Elizabeth Hansford
Kirt Hanson
Zella D. Hapeman
Richard Hardesty
Kathleen Hargrave
Brooks Harlow
R.J./M.R. Harris
Richard W. Harris
Howard Harrison

Joan Harry
Lisabeth Hart
Michael Harvey
Fred Hassler
Mike/Ann Haucke
Chris Haymes
David Heiner
Dale Heldt
Carol Helland
David Hemer
Travis/N. Henderson
William Herlan
Jana Herman
Judy Hermann
Andrew Herron
John/Colleen Heselgrave
Dan Hiatt
Edward Hill
Richard Hill
Sharon Hirsh
Larry Hoffman
S.L. Singhose/E.M. Hogan
Cindy Hohlbein
Doug Holmstrom
Peter Holt
Debbie/Keith Honsberger
Margaret Hopper
Marianne Hoskins
Ivy Jo Houghton
Michael Hovaner
Thomas H. Huemmer
Kristi L. Hulen
Jolie Imperatori
Kelly L. Ingham
Patricia Inui
Brian Issacson
Daniel Janus
Ken Jauch
Kenan Jeffereis
Jean E. Jenkins
Mary Jesse
David Jezak
Gary Johnson
Jay Johnson
Douglas Johnston
Greg Johnston
Loretta Jonason
Ann/William Jones
Dick Jones
Michelle Jovanovich
Nora Beck Judd
Joseph/Patricia
DeAngelis, Jr
Virginia/Francis A.
Hagan, Jr
Ruth/William Barclay, Jr
Bill Calderhead, Jr
Thomas Nelson, Jr
Robert W. Westover, Jr
Judy/Richard Kaethler
Monika Kaetz
Chuck Keenan
Kris Keppeler
Ann Killian
Diana Kinared
Raymond Kirkland
Pamela Kludt
KCM/Greg Gaasland
Steve Knechtel
Mary Knerl
Dick/Karen Knight
Dorothy Knitter
Peggy Kocher
Hiromi Komatsu
Donald E. Kono
John Koruga
Joanna/Marta Koszlawska
Fenton Kraft
Tim Krause
Bill Kreager
Doris/Bob Kruse
William Ladd
Susan C. Landis
James Lane
Julie/Michael Lang
Judith Laplante
Jeanne Large
Rich Larrica
Jim/Linda Larson
Donna Larson
Muriel C. Larson
Terry Lavender
Jeff Layton
Doris Kay Lederman
Leo Lehmicke
Beverley Leonard
Barbara Levin
Katherine Lewis

Frank/Estelle Liberio
Geof/Vickie Lindblad
Barbara & Gary Linstedt
Judith Eve Lipton
Miguel Llanos
Abbie de Long
Brenda Long
Liza Loofbourrow
Joan Lorenzen
Patricia Losey
Louise Loutsis
Leonard Lundstrom
Dorothy Lundvalt
Jim MacIsaac
Sarah E. Mack
Elizabeth MacWhinney
Christine/Tim Magee
James Mahar
Glenda Maledy
Jeff Mandell
Barbara Manley
Barbara Mar
Harry S. March
Gordon Mark
Steve Marker
David Markley
Peter S. Marshall
Shelby R. Martin
Larry C. Martin
Samuel A. Martin
Jane Mason
Esther/Jack Matches
Krista Matheisen
Dorothy Matsui
Ron Matteson
Duane E. Matthews
Sheryl Matthews
Juli M. Mauck
Bernard John/Beth Maureil
Beth Maurer
James McBride
James/Lin McBride
Bruce McCain
M Gilluly/C McCandless
Michael McCannel
Michael S. McCauley
Theresa McCoy
Lee McCracken
Elizabeth McCready
Thomas McCreery
John McDaniel
Dan/Derek McFadden
William D. McFadden
Kimberlee McJunkin
Gordon McKelvey
Rick McManus
Lawrence McMurtrey
Darcy McNamara
Nancy Melson
Rich/Sandra Melton
John Merriam
Terry Metzen
Kathy/Bruce Meyer
Loren Meyer
Louise/Donald Miller
Thomas Miller
Emily H. Miller
Edward/Mary Ellen Miller
Dorothy Milligan
Elizabeth Minnich
David Mobile
Donald Moore
William/Heather Morel
Trudie Morton
Michael Mossman
Walita/Anton Mroz
John Murphy
Douglas P. Nation
Shelly Navarre
Edward T. Neighbors
Nancy Nelson
Dale Newland
Jon/Lisa Nicponski
Nelda Nikko
Helen Nilon
Jerry Nissley
Vicky Nollette
A.J./Betty P. Novak
Timothy Nyberg
Steve O'Donnell
Mary O'Farrell
Jerrold/Kathleen Oaklief
Suz Gentiluomo/Joel
Ohringer
Martha Rego/Eugenio Oila
Van Oler
Cora Oleson
Sandra Oliver

Richard/Cindy Olson
LeRoy/Vera Olson
Nancy Omiliak
Lisa Oratz
Richard/Mary Osborne
Tere Ovenell
Otak, Inc/Ken Nelson
Sam Pace
Parametrix/Carl Stivers
Jeff Paine
Jim Palmer
Steven Palmer
Dr. Bob Palmquist
Jason Papacosma
Susan Park
Lokelani Parker
Deloa Parrish
Connie Patmore-Farr
Patricia Patterson
Janis C. Peet
Bob Pepper
Jillain Peterson
Carolyn Peterson
Shelli/Mike Peterson
Debra Pezzillo
Doug Phillips
Bruce/Linda Pickard

Cristie/Charles Piquette
John Plovie
Rick Porter
Richard Pound
Greg/Debbie Prater
Sandy Prater
Patricia Prior
Mary Pritchard
Ellouise Pritchett
Marilyn/Brian Pulk
Raedecke Associates/Rick
Lundquist
Dan Ramirez
Scott Randebaugh
Scott Randell
Peter Ratener
Laurence Raybois
Kenneth R. Reeves
Deborah/William Reffett
David Reid
Mike/Jodi Reinhart
Craig Reininger
Richard/Jamie Reynolds
Kevin Rhoads
Mark/Lise Richardson
Chris Rimple
Susan T. Rivers
Andy Roach
Jeff Robecson
Shelle/Earl Robinson
Ward/Val Roney
Barbara Rosenwald
Bob Routsong
Jill Routt
Charles M. Rowland
Mark Rubbert
Nancy Safford
Pam Saftler
Anne Salmi
Stalzer & Associates
Glenna/Tim Sataliel
Gail Sauerbrey
Fred/Henriet Schapelhouman
Karen Schmidt
Aldon Schwimmer
Joan Scoggins
Lindsey Scott
Pam Scott
Julie Scott
Marty/Eleanor Sedluk
Mark Shaffer
Rm Shank
Shapiro & Associates
Pacific Groundwater/
Charles Ellingson
Transpo Group/Larry Toedtli
C.Smelser & S.Marshall
Hicks/ Attorneys At Law
CH2M Hill/Ben Giddings
Lk.of Woods HOA/Larry
Malakoff
WinchesterHOA/ThomasD'Epagn
ier
Novelty Hill Ranch Est.HOA/
Wende Doohan
Mithun Partners, Inc/
William Kreager
Herrera Environmental
Consl.
Performance, Inc/Earl
Diller
Northwest Engineering
Company
Gibson Traffic Consl./
Terry Gibson
Beak Consultants/Andy
Kindig
Quadrant Corp./Leslie Lloyd
Quadrant Corp./Peter Orser
Dyanne Sheldon
Roger M. Shell
Laura/Ken Shepard
Bob/Doreen Sherwood
Betty E. Shires
Bob Shrosbree
John Simpson
Sharon L. Slavick
Dennis K. Smart
Phyllis Smith
Carol Smith
Mary Ellen Smulski
L. Cripe/W. Soderlind
Brenda/Dean South
Mary Speers
Mike Spencer
John Stachurski
Paul/Lori Stanton
Janet Starling

Richelle R. Stauch
Chris Steele
Sue Ellingson/Mia
Steinberger
Nancy Stevens
Janet M. Stelowitz
Betty Stott
Randy Strand
Arne Stray
Jennifer Stremic
Eric Stroo
John Stuart
Dale Suit
Maureen Sunn
Carolyn Swadley
Karen Taylor
Kathryn Taylor
Nancy R. Temkin
David/Nancy Thacher
Mr/Mrs Tharp
K. T. Thorsos
Mike Tiano
Ed Tolan
Harvey Tollfeldt
Walter Trial
Linda Triboulet
Greg Tryon
Donald W. Tubbs
Ed/Cherri Turnbull
Jack/Linda Turner
Kathleen Turner
Dawnbreaker Water Assoc./
Fenton Kraft
Union Hill Water Assoc./
Richard Hardesty
Union Hill Water Assoc./
John Phillips
Kim van Ekstrom
Patty VanLaeken
David A. VanRossum
Susan Juhre/Dirk VanVeen
Alex Vdolek
Ron/Juanita Verschuyl
Eugenie Vila
David VonRossum
Davis Wright Tremaine/
Tom Goeltz
Davis Wright Tremaine/
Katherine Laird
Snoqualmie Indian Tribe
Muckleshoot Indian Tribe/
Rod Malcom
University of Washington/
Derek Booth
J & D Wade
Bruce Wagner
Robert M. Wainger
Jon R. Waite
Deena Waits
W. D. Walker
Vicky/Angus Mack Walker
Sue Walker
Sunny Wallace
B. J. Wallick
Karen Walsh
Wendy Walsh
Em Walters
Mr./Mrs. Ron Ward
Lake Wash.School Dist.#414
Watershed Dynamics/
Greg Johnston
John Wedgwood
Richard Weinman
Jack Weisbly
Judy/Jeremy Weiser
Joan/Robert Wells
Jeff/Kathy West
Richy West
Judith Westall
Rachael Whaley
Rebecca D. Wheeler
Peggy White
Mary Whitehurst
Donna S. Whitemaine
Kinnon Williams
Sarah Williams
Robert D. Williamson
Judy/Chris Willman
Steven/Darla Wilson
Richard Wilson
Glen Wilson
Ruth Winbauer
Eleanor Windsor
Mary Winningham
Maggie Windus
Bruce Winter
Paul Wittrock
Jon Wolff

Barbara Wood
Kelly/Renon Wood
Bruce Woodstrom
William Woodworth

Jon Wulff
John/Jan Wyatt
Ann Yasui
Walt Yeager
Dorothy/Dale Young
Susan Young
Grace Yuan
Robin/Paul Zambrosky

King County Fire District #34
King County Fire District #36
King County Fire District #45
Riverview School District #407
Puget Sound Air Pollution Control Agency/N. Maykut
City of Carnation/Mayor Jack Stein
City of Carnation/Administrator
Washington Natural Gas Company/David Naro
Puget Sound Power & Light Company/Betsy Minden
Puget Sound Power & Light Company/Andy Padvorac
Woodinville Water District/B. Bandarra
Woodinville Water District/Ken Pick
City of Duvall/Mayor Glenn Kuntz
City of Duvall/Community Development Director
US Army Corps of Engineers/Bob Martin
Redmond Sammamish Valley News/Mike Lee
Woodinville Weekly News/Jeff Switzer
Eastside Edition, Seattle Times News/Sarah Williams
Journal American News/Linda Thielke
City of Redmond/Mayor Rosemarie Ives
City of Redmond/Don Cairns, Transportation Manager
City of Redmond/John Couch, Parks & Recreation
City of Redmond/Robert Lewandowski, Planning Director
City of Redmond/Carol Osborne, Public Works Director
City of Redmond/Commander Corwin Heimbigner
City of Redmond/Scott Thomasson, Utilities Coordinator
City of Redmond/Walter Zisette, Planner
City of Redmond/Timothy Trohimovich, Senior Planner
City of Seattle, Office of Long Range Planning
City of Seattle, Water Department/Stephanie Murphy
City of Seattle, Water Department/Bill Alves
Washington State Department of Ecology/Janet Thompson
Washington State Department of Fisheries/Rich Johnson
Washington State Department of Natural Resources/Ben Cleveland
Washington State Department of Transportation/Richard Anderson
Washington State Department of Wildlife/Tony Opperman
TransAmerica Title/Tom Kellogg
Don Althaus, KCDNR, Surface Water Management Division
Tom Beavers, KCDNR, Natural Resource Division
Tom Bertek, King County Department of Transportation
Greg Borba, DDES/LUSD, Site Plan Review
Steve Bottheim, DDES/LUSD, Site Development Services
Tommy Burdette, KCDOT, Road Services Division
Judy Chapman, Metropolitan King County Council
Sharon Clausen, Parks
LuAnne Coachman, DDES/LUSD, SEPA
Cyrilla Cook, KCDNR, Surface Water Management Division
Peter Dye, DDES/LUSD, Engineering Review
Paul Eichhorn, DDES, Building Services Division
Tom Eksten, DNR, Natural Resources Division
Dianne Erhlich, METRO
Steve Foley, KCDNR, Surface Water Management Division
Dennis Gorley, KCDOT, Road Services Division
John Heal, KCDNR, Surface Water Management Division
Bill Hoffman, King County Transportation & Planning
Rich Hudson, DDES/LUSD, SEPA
Dan Jewett, King County Department of Transportation
Fatin Kara, KCDNR, Surface Water Management Division
Jackie Krollop Kirn, DDES/LUSD, Engineering Review
Tom Kooney, Metropolitan King County Council
Elizabeth Lee, DDES/LUSD, Site Plan Review
Beth Mountsier, DDES/LUSD, SEPA
Michaelene Manion, DDES/LUSD, Site Plan Review
Phil Miller, King County Department of Transportation
Paulette Norman, King County Department of Transportation
Bill Oakes, KCDNR, Surface Water Management Division
Carl Osaki, King County Health Department
Lisa Pringle, DDES/LUSD, Site Plan Review
Lorin Reineldt, KCDNR, Surface Water Management Division
Paul Reitenbach, Office of Budget & Strategic Planning
John Shively, King County Department of Transportation
Mike Sinsky, Prosecuting Attorney's Office, Civil Division
David Stallings, METRO
Ellen Turner, DDES/LUSD, SEPA
Caroline Whalen, Metropolitan King County Council

NOTICE OF RIGHT TO APPEAL
AND ADDITIONAL ACTION REQUIRED

In order to appeal the recommendation of the Examiner, written notice of appeal must be filed with the Clerk of the King County Council with a fee of \$125.00 (check payable to King County Office of Finance) on or before **July 11, 1996**. If a notice of appeal is filed, the original and 6 copies of a written appeal statement specifying the basis for the appeal and argument in support of the appeal must be filed with the Clerk of the King County Council on or before **July 18, 1996**. Appeal statements may refer only to facts contained in the hearing record; new facts

may not be presented on appeal.

Filing requires actual delivery to the Office of the Clerk of the Council, Room 403, King County Courthouse, prior to the close of business (4:30 p.m.) on the date due. Prior mailing is not sufficient if actual receipt by the Clerk does not occur within the applicable time period. The Examiner does not have authority to extend the time period unless the Office of the Clerk is not open on the specified closing date, in which event delivery prior to the close of business on the next business day is sufficient to meet the filing requirement.

If a written notice of appeal and filing fee are not filed within fourteen (14) calendar days of the date of this report, or if a written appeal statement and argument are not filed within twenty-one (21) calendar days of the date of this report, the Clerk of the Council shall place a proposed ordinance which implements the Examiner's recommended action on the agenda of the next available Council meeting. At that meeting, the Council may adopt the Examiner's recommendation, may defer action, may refer the matter to a Council committee, or may remand to the Examiner for further hearing or further consideration.

Action of the Council Final. The action of the Council approving or adopting a recommendation of the Examiner shall be final and conclusive unless a proceeding for review pursuant to the Land Use Petition Act is commenced by filing a land use petition in the Superior Court for King County and serving all necessary parties within twenty-one (21) days of the date on which the Council passes an ordinance acting on this matter.

MINUTES OF THE APRIL 29 THROUGH MAY 24, 1996, PUBLIC HEARING ON DEPARTMENT OF DEVELOPMENT AND ENVIRONMENTAL SERVICES FILES NO.L96FC001, L94UP001, L95P0005, BCCP002, AND THE DEPARTMENT OF TRANSPORTATION FILE NO. V-2270 - NORTHRIDGE FULLY CONTAINED COMMUNITY, URBAN PLANNED DEVELOPMENT, SUBDIVISION, P-SUFFIX AMENDMENT AND ROAD VACATION

Stafford L. Smith was the Hearing Examiner in this matter. Participating at the hearing were Don Althaus, Greg Borba, Steve Bottheim, Betsy Czark, Peter Dye, Tom Eksten, Steve Foley, Dennis Gorley, Bill Hoffman, Rich Hudson, Fatin Kara, Lisa Lee, Ann Martin, Beth Mountsier, Paulette Norman, Bill Oakes, Sue Osterhouth, Lorin Reinelt, Matthew Shelden, Diane Sheldon, John Shively, and Michael Sinsky representing the County, and John Adams, James Bailey, Mike A. Ball, Sue Balsiger, David Barash, Houston Barclay, Barbara Beeson, Don Berkowitz, Tamara Bernstein, Douglas Beyerlein, Derek Booth, Donald Cairns, Charles Carpp, Dave Chenault, Phil Cohen, Jake Couch, John Couch, Rob Crittenden, Phil Croom, Kristina Dalman, Dan Dunavant, Wayne Dunton, Joseph Elfelt, Charles Ellingson, Jeff Eustis, Paul Fendt, Robert B. Filley, Gregory Gaasland, Terry Gibson, Ben Giddings, Tom Goeltz, Keith Goldsmith, Dana Good, Neville Gordon-Carroll, Linda Hamm, James E. Haney, Corwin Heimbigner, Doug Holmstrom, Mayor Rosemarie Ives, Douglas Johnston, Greg Johnston, Andy Kindig, Curtis Koger, William Kreager, Bill Ladd, Katherine Laird, Lou Lepp, Roberta Lewandowski, Barbara Linstedt, Leslie Lloyd, Rick Lundquist, Larry Malakoff, Jeff Mandell, Beth Maurer, Dan McFadden, Tom Meyer, Errol Nelson, Steve O'Donnell, Mary O'Farrell, Peter Orser, Sam Pace, Robert Palmquist, Robert Pepper, John F. Phillips, Mary Pritchard, Bob Routsong, Pam Saftler, Glenna Satalich, Henriët Schapelhouman, Mark Shaffer,

Roger Shell, Ken Shephard, Gary Siemion, Leah Simpson, Curt Smelzer, Carl Stivers, Michael Stringam, Maureen Sunn, Kathryn Taylor, Mike Tiano, Scott Thomasson, Larry Toedtli, Wally Trial, Tim Trohimovich, Donald Tubbs, Kim van Ekstrom, Sunny Wallace, James Westall, Judy Willman, Richard Wilson, Grace Yuan, Robin Zambrosky

The following exhibits were offered and entered into the hearing record **April 29, 1996:**

- Exhibit No. 1 Northridge Urban Planned Development Permit File No. L94UP001
- Exhibit No. 2 Northridge Master Plan Development File No. S89P003
- Exhibit No. 3 Northridge North Plat File No. L95P0005
- Exhibit No. 4 Northridge Fully Contained Community Permit File No. L96FC001
- Exhibit No. 5 Bear Creek Area Zoning P-Suffix Amendments File No. BCCP0002
- Exhibit No. 6 Bowman and C. Robstad Roads Vacation File No. V-2270
- Exhibit No. 7 Affidavit of posting indicating the property was posted, giving notice of the FCC Permit, UPD Permit, subdivision, Bear Creek Area Zoning P-suffix amendments, and road vacations.
- Exhibit No. 8 Affidavit of mailing notice for 500-foot radius properties and parties of record.
- Exhibit No. 9 Affidavit of notice publication in the Seattle Times for the FCC Permit, UPD Permit, subdivision, Bear Creek Area Zoning P-suffix amendments, and road vacations.
- Exhibit No. 10 Affidavit of notice publication in the Sammamish Valley News of the FCC permit, UPD Permit, subdivision, Bear Creek Area Zoning P-Suffix, and road vacations.
- Exhibit No. 11 Affidavit of notice publication in the Seattle Times of the road vacations
- Exhibit No. 12 Northridge UPD permit application update received by King County on July 15, 1994.
- Exhibit No. 13 Northridge Draft Environmental Impact Statement published May, 1995. Volumes 1 through 4.
- Exhibit No. 14 Northridge Final Environmental Impact Statement published January 1996. One volume.
- Exhibit No. 15 Processing Memorandum of Understanding between Quadrant and King County Executive, signed July 29, 1996.
- Exhibit No. 16 Letter from William Hoffman, Manager, Transportation Planning Section, Department of Public Works, to the Quadrant Corporation, dated March 13, 1996, with attached Conditional Certificate of Transportation Concurrence.
- Exhibit No. 17 Certificate of Sewer Availability from City of Redmond, dated March 28, 1996.
- Exhibit No. 18 Certificate of Water Availability from City of Redmond, dated March 28, 1996.
- Exhibit No. 19 Agreement between Fire District No. 34 and Quadrant and Port Blakely Tree Farms.
- Exhibit No. 20 Northridge UPD Development Standards for Sensitive Areas Prepared by Hugh G. Goldsmith & Associates, Inc. Revised November 1995
- Exhibit No. 21 Bear Creek Community Plan and Area Zoning
- Exhibit No. 22 Draft EIS and Final EIS for Bear Creek Plan and Area Zoning
- Exhibit No. 23 Ordinance 10153 establishing the Bear Creek Master

Plans as demonstration projects.
Exhibit No. 24 Northridge Drainage Master Plan (DMP), dated April
12, 1996.

- Exhibit No. 25 Letter from Robert Derrick, Director, DDES, to the Hearing Examiner, dated April 12, 1996, with a recommendation on the Northridge Drainage Master Plan.
- Exhibit No. 26 Letter from Jesse Krail, Manager, Roads, KC Department of Transportation, to James Sanders, Land Use Services Division, dated April 12, 1996, regarding street design modifications.
- Exhibit No. 27 Department of Transportation, Road Services Division, report on Bowman and C. Robstad Road Vacation.
- Exhibit No. 28 King County staff report on the Northridge FCC Permit, UPD Permit, subdivision, Bear Creek Area Zoning P-Suffix amendments, and road vacations dated April 29, 1996.
- Exhibit No. 29 King County Executive Proposed Northridge FCC/UPD permit and conditions, dated April 29, 1996.
- Exhibit No. 30 Letter from Robert Derrick, Director, DDES, to Northridge Parties of Record, dated April 15, 1996.
- Exhibit No. 31 Ordinance 11954 amending the Bear Creek Community Plan policies related to the Novelty Hill Master Plan Developments.
- Exhibit No. 32 Blakely Ridge Draft EIS published April 1993.
- Exhibit No. 33 Blakely Ridge Final EIS published June 1995.
- Exhibit No. 34 Hearing Examiner's report and recommendation to the King County Council dated September 27, 1996 for Blakely Ridge.
- Exhibit No. 35 Ordinance 12093 amending the 1989 Bear Creek Area Zoning P-suffix conditions pertaining to the Blakely Ridge UPD.
- Exhibit No. 36 Ordinance 12090 approving the Blakely Ridge UPD.
- Exhibit No. 37 Blakely Ridge Development Agreement with attached UPD Permit conditions, recorded January 9, 1996.
- Exhibit No. 38 Ordinance 12170 amending the Comprehensive Plan policies and land use map, area zoning, pertaining to Fully Contained Communities.
- Exhibit No. 39 Ordinance 12171 amending the Zoning Code, adding a process and criteria for reviewing Fully Contained Communities.
- Exhibit No. 40 Ordinance 12063 adopting school district capital facilities plan.
- Exhibit No. 41 Lake Washington School District Capital Facilities Plan (1994/1995 - 1999/2000).
- Exhibit No. 42 Ordinance 12195 revising the approval time for preliminary plats.
- Exhibit No. 43 Northridge UPD/FCC Site Plan
- Exhibit No. 44 Northridge North Preliminary Plat
- Exhibit No. 45 Regional Parks and Trails Map
- Exhibit No. 46 Non-Motorized Circulation Plan
- Exhibit No. 47 Resource Protection Map
- Exhibit No. 48 Regional Drainage Basin Map
- Exhibit No. 49 Northridge Drainage Plan Map
- Exhibit No. 50 Identification of Registered Wells in Project Vicinity
- Exhibit No. 51 On-Site Road Classification Map
- Exhibit No. 52 Novelty Hill Road Frontage Improvements
- Exhibit No. 53 Proposed Water Service Facilities
- Exhibit No. 54 Proposed Bear Creek Basin Trunk Sewer
- Exhibit No. 55 Aerial Photograph of Northridge Site (taken September 1995).
- Exhibit No. 56 EIS Alternative 1
- Exhibit No. 57 EIS Alternative 2

Exhibit No. 58 Northridge UPD/FCC Phasing Plan
Exhibit No. 59 Transit Circulation Map
Exhibit No. 60 Northridge 1989
Exhibit No. 61 Northridge 1991
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Exhibit No. 70 Duvall Growth Rates
Exhibit No. 71 Novelty Hill Road - Historical and Forecast PM Peak Hour Traffic Volumes
Exhibit No. 72 1996 Transpo PM Peak Hour Traffic Counts for 208th Avenue at Novelty Hill Road and Union Hill Road
Exhibit No. 73 PM Peak Hour Traffic Distribution at Northridge
Exhibit No. 74 Primary Travel Routes and Assignments to/from Redmond and SR 520
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Exhibit No. 76 2005 FEIS Cumulative Daily Traffic Forecast
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Exhibit No. 78 2005 Cumulative PM Peak Hour Traffic Volume Components at Key Intersections
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Exhibit No. 80 Existing and 2005 PM Peak Hour Levels of Service at Key Intersections in Unincorporated King County / Bar Chart
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Exhibit No. 92 Downstream Reconnaissance - Mackey Creek
Exhibit No. 93 Downstream Reconnaissance - Evans Creek
Exhibit No. 94 Downstream Reconnaissance - Colin Creek
Exhibit No. 95 Wetlands and Topography
Exhibit No. 96 Master Drainage Plan (MDP) Flow Chart
Exhibit No. 97 Subsurface Exploration Map
Exhibit No. 98 Hydrology Exhibit
Exhibit No. 99 Monitoring Flow Chart
Exhibit No. 100 Summary of Findings
Exhibit No. 101 Hydrogeologic Evaluation Flow Chart
Exhibit No. 102 Generalized Stratigraphic Column
Exhibit No. 103 Puget Lobe of the Cordilleran Ice Sheet
Exhibit No. 104 Ice Limits
Exhibit No. 105 Whidbey Paleogeography
Exhibit No. 106 Glacial Environments/Glacial Deposits
Exhibit No. 107 Surficial Geologic Map with Outcrop Locality Map Overlay
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Exhibit No. 109 Hydrogeologic Data Base Map

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Exhibit No. 114	Aquifer Definitions
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Exhibit No. 154	Union Hill Water Association Well 3
Exhibit No. 155	Figure 9: Potential Static Water Level Reduction - Vashon Advance Aquifer - No Mitigation
Exhibit No. 156	Figure 10: Potential Static Water Level Reduction - Upper Possession Aquifer - No Mitigation
Exhibit No. 157	Figure 11: Ground Water Mounding and Drawdown in Vashon Advance Aquifer with Mitigation
Exhibit No. 158	MODFLOW Schematic Grid Overlay
Exhibit No. 145	AGI Composite Capture Zones and CARA

Exhibit No. 146	Middle Whidbey (Primary) Aquifer Channel Map
Exhibit No. 147	Lithology Board 1 of 3
Exhibit No. 148	Lithology Board 2 of 3
Exhibit No. 149	Lithology Board 3 of 3
Exhibit No. 150	Static Water Hydrographs vs. Rainfall (Vashon Till and Vashon Advance)
Exhibit No. 151	Site #4: Cross Section and Photos
Exhibit No. 152	Schematic Regional Ground Water Flow Diagram
Exhibit No. 153	MODFLOW Cell Diagram
Exhibit No. 154	Union Hill Water Association Well 3
Exhibit No. 155	Figure 9: Potential Static Water Level Reduction - Vashon Advance Aquifer - No Mitigation
Exhibit No. 156	Figure 10: Potential Static Water Level Reduction - Upper Possession Aquifer - No Mitigation
Exhibit No. 157	Figure 11: Ground Water Mounding and Drawdown in Vashon Advance Aquifer with Mitigation
Exhibit No. 158	MODFLOW Schematic Grid Overlay
Exhibit No. 159	Hydrogeologic Modeled Zone of Influence; Derived from MDP Chapter 3, Figure 3.9
Exhibit No. 160	Water Quality Analysis by Catchment; Derived from MDP Chapter 3, Table 3.6-2
Exhibit No. 161	Infiltration/Dispersion Trench Cross-Section; Derived from MDP Chapter 3, Figure 3.5
Exhibit No. 162	Water Quality Assessment Summary; Derived from MDP Chapter 3, Table 3.6-4
Exhibit No. 163	Runoff Constituent Concentrations at Entry to Infiltration Basins; Derived from MDP Chapter 3, Table 3.9
Exhibit No. 164	Welcome Lake History; Derived from MDP Chapter 3, Figure 3.7
Exhibit No. 165	Phosphorous Release Patterns from Northridge Wetlands; Derived from MDP Chapter 3, Table 2.5, and Herrera 1992
Exhibit No. 166	Cumulative Phosphorous Loading to Welcome Lake; Derived from MDP Chapter 3, Table 3.11
Exhibit No. 167	Welcome Lake Trophic State Index (TSI) Analysis; Derived from MDP Chapter 3, Tables 2.4, 3.7-1, and 3.7-2
Exhibit No. 168	Surface Water Quality Evaluation; Proposed Northridge Master Plan Development, Herrera Environmental Consultants, Inc., December 1992
Exhibit No. 169	Water Supply Planning Timeline
Exhibit No. 170	Bear Creek Basin Stream and Fish Use Map
Exhibit No. 171	Proposed Draft Northridge UPD/FCC Development Agreement
Exhibit No. 172	Analysis of Northridge Compliance with Bear Creek Community Plan and P-Suffix Conditions
Exhibit No. 173	Résumé of Larry W. Toedtli, P.E.
Exhibit No. 174	Résumé of Holly A. Parsons, P.E.
Exhibit No. 175	Résumé of Benjamin D. Giddings, P.E.
Exhibit No. 176	Résumé of William Kreager, A.I.A.
Exhibit No. 177	Résumé of Keith J. Goldsmith, P.E.
Exhibit No. 178	Résumé of Lou R. Lepp, C.P.G.
Exhibit No. 179	Résumé of Curtis J. Koger, C.P.G.
Exhibit No. 180	Résumé of Donald W. Tubbs, Ph.D.
Exhibit No. 181	Résumé of Andrew C. Kindig, Ph.D.
Exhibit No. 182	Résumé of Richard W. Lundquist
Exhibit No. 183	Résumé of Lawrence M. Karpack, P.E.
Exhibit No. 184	Résumé of Mark E. Shaffer, P.E., P.G.
Exhibit No. 185	Résumé of Kenneth J. Raedeke, Ph.D.
Exhibit No. 186	Résumé of Dorothy Milligan

Exhibit No. 187	Résumé of Gregory P. Johnston
Exhibit No. 188	Evaluation of Water Quality Ponds and Swales in the Issaquah/East Lake Sammamish Basins (October 1995)
Exhibit No. 189	Blakely Ridge Master Plan Development - Stormwater Treatment: A Comparison of Soluble Pollutant Removal in Wetponds and Biofilters (Herrera Environmental Consultants: May 6, 1992)
Exhibit No. 190	Blakely Ridge Master Plan Development - Comparison of Requirements for Stormwater Treatment Under Current King County and Washington State Department of Ecology Guidelines (Herrera Environmental Consultants: March 25, 1992)
Exhibit No. 191	Cedar-Sammamish Basin Instream Resources Protection Program Including Proposed Administrative Rules, and Supplemental Environmental Impact Statement (Water Resource Inventory Area 8) (State of Washington Department of Ecology: August 1979)
Exhibit No. 192	Draft Technical Memorandum - Delineation of Wellhead Protection Areas, City of Redmond Wellhead Protection Project (Pacific Groundwater Group: September 12, 1995)
Exhibit No. 193	Technical Memorandum - Conceptual Model of Hydrogeology, City of Redmond Wellhead Protection Project (Pacific Groundwater Group: August 25, 1995).
Exhibit No. 194	
-1	Draft Redmond-Bear Creek Valley Ground Water Management Plan Supplement, Proposed March, 1996, by Redmond-Bear Creek Water Advisory Committee
-2	Draft Redmond-Bear Creek Valley Ground Water Management Plan Supplement, Proposed March, 1996, by: Redmond-Bear Creek Ground Water Advisory Committee
Exhibit No. 195	Preliminary Draft Northridge UPD Technical Report on Water Quality (Beak Consultants, Inc.: September, 1994).
Exhibit No. 196	Resume' of Paul S. Fendt, P.E.
Exhibit No. 197	Resume' of David E. Jennings, P.E.
Exhibit No. 198	Resume' of James C. Good
Exhibit No. 199	Resume' of Carl Stivers
Exhibit No. 200	Resume' of Charles T. Ellingson
Exhibit No. 201	Resume' of Phillip L. Cohen
Exhibit No. 202	Letter to Kamuron Gurol of King County from Chris Owens of the Redmond Planning Department dated June 16, 1996, including the City of Redmond's comments on the Blakely Ridge PEDIS Transportation Analysis
Exhibit No. 203	Memorandum to John Shivery of King County from Donald Cairns dated march 8, 1995, about Blakely Ridge UP mitigation
Exhibit No. 204	Letter dated June 9, 1995, from Donald Cairns to Bill Hoffman re June 8, 1995, telephone conversation
Exhibit No. 205	Letter dated July 24, 1992, from Chris Owens to Lou Haff re Blakely Ridge and Northridge traffic forecast issues
Exhibit No. 206	Letter dated November 14, 1994, from Robert Crittenden to Walter Zisette re Northridge UP and PEDIS Transportation Technical Index

Exhibit No. 207	Letter dated October 17, 1995, from Donald Cairns to Rich Hudson re Northridge Preliminary FEIS
Exhibit No. 208	Letter to Robert Crittenden from Terry Gibson dated April 10, 1996, re Northridge UP FEIS and responses to comments on DEIS
Exhibit No. 209	City of Redmond Planning Commission Report dated December 19, 1995, about application DGA95-004, Transportation Management Code (Regulations to determine transportation concurrency and impact fees)
Exhibit No. 210	Map entitled, "2010 Long Term Traffic Analysis - Northridge UP Select Zone Volumes," prepared by City of Redmond and dated October 26, 1995
Exhibit No. 211	Map entitled, "2010 Long Term Traffic Analysis - Total PM Volumes," prepared by City of Redmond and dated October 26, 1995
Exhibit No. 212	Resume' of Donald W. Cairns
Exhibit No. 213	Resume' of Robert T. Crittenden
Exhibit No. 214	Resume' of Terry L. Gibson
Exhibit No. 215	An Evaluation of Union Hill Water Resources with Reports on Wells 1, 2 and 3 by Carr & Associates
Exhibit No. 216	Resistivity Surveys Method and Results - December 1992
Exhibit No. 217	Characterization and Protection of the Union Hill Aquifer System dated January 19, 1993, by Carr & Associates
Exhibit No. 218	Draft Report: Union Hill Water Association Wellhead Protection Program - Delineation, Inventory & Management Options - April 19, 1996, by AGI Technologies
Exhibit No. 219	Revisions and Corrections to Draft Report (Exhibit No. 218) dated April 24, 1996
Exhibit No. 220	Modeling and Monitoring to Predict Spatial and Temporal Hydrologic Characteristics in Small Catchments - June 1994 - University of Washington Water Resources Series Technical Report #137
Exhibit No. 221	Review of Northridge UPD DEIS dated July 7, 1995, by AGI Technologies
Exhibit No. 222	On Site Residential Stormwater Management Alternatives prepared for Washington State Department of Ecology November 1995, by University of Washington, Department of Civil Engineering
Exhibit No. 223	Well Water Level Data - Rainfall Data Well No. 1 and Well No. 2 - April 15, 1996
Exhibit No. 224	Letter dated April 15, 1996, from Craig Russell (AGI) to Union Hill Water Association

The following exhibits were offered and entered into the hearing record **April 29, 1996:**

Exhibit No. 225	Northridge UPD/FCC Fact Sheet submitted by Applicant
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The following exhibits were offered and entered into the hearing record **April 30, 1996:**

Exhibit No. 226	Excerpt from "Large-scale Development" by ULI Research Division - Urban Land Institute,
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Washington D.C.
Exhibit No. 227 Outline of Toedtli testimony
Exhibit No. 228 Stipulation between Lake of the Woods
Homeowners' Association and Quadrant
Exhibit No. 229 Northridge UPD Offsite Transportation
Mitigation Proposal submitted by Applicant

The following exhibits were offered and entered into the hearing
record **May 1, 1996:**

Exhibit No. 230 Oral and written presentation by Judy Willman
Exhibit No. 231 Technical Appendix D to 1994 County
Comprehensive Plan
Exhibit No. 232 Graphic prepared by Joseph Elfelt "King
County Dwelling Units Capacity in Urban
Growth Area"
Exhibit No. 233 Statement (with attachments) prepared and
read into hearing record by Kathryn Taylor

The following exhibits were offered and entered into the hearing
record **May 2, 1996:**

Exhibit No. 234 Avondale triangle vicinity transportation
system sketch by Larry Toedtli

The following exhibits were offered and entered into the hearing
record **May 3 1996:**

Exhibit No. 235 Metro bus schedule for Routes 922 and 929
serving Redmond, Carnation, Duvall, etc. area
Exhibit No. 236 Aerial map of 236th/238th Avenue Northeast
Exhibit No. 237 King County Public Rules - Integrated
Transportation Program
Exhibit No. 238 Transportation Adequacy Measure - definition
and discussion
Exhibit No. 239 Hard copies of view foils used in Gibson
testimony
Exhibit No. 240 Memorandum of Understanding for Developer
Mitigation for Road Impacts between King
County and the City of Redmond
Exhibit No. 241 Memorandum of Understanding for Blakely Ridge
Developer Mitigation for Road Impacts within
the City of Redmond

The following exhibits were offered and entered into the hearing
record **May 6, 1996:**

Exhibit No. 242 Summary of Terry Gibson testimony
Exhibit No. 243A Redmond TAZ and network system
Not admitted B UPD trips using Central Loading point
Not admitted C Northridge UPD Trip Distribution on Novelty
Hill Road and Union Hill Road
Exhibit No. 244 Trip distribution table
Exhibit No. 245 Bar graph illustrating difference between
proportionate share method
Exhibit No. 246 Packet of documents illustrating Crittenden
testimony
Exhibit No. 247 Year 2010 Pro-Rata Mitigation Table
Exhibit No. 248 Transportation Impact Fee Technical Report
Exhibit No. 249 Proposed conditions from testimony of Michael
Stringam

The following exhibits were offered and entered into the hearing record **May 7, 1996:**

Exhibit No. 250	Written testimony of Errol Nelson
Exhibit No. 251	Memorandum dated April 1, 1996, from Richard Weinman of Huckell/Weinman Associates to Leslie Lloyd (Quadrant)
Exhibit No. 252	Real Estate Assessment of Supply and Demand Conditions for Commercial Office, High-Technology, Business Park and Light Industrial Employers
Exhibit No. 253	Villages at North Bend Design Handbook
Exhibit No. 254	Northwest Landing Residential Design Standards and Guidelines
Exhibit No. 255	Northridge proposed land use submitted by staff
Exhibit No. 256	Photographs (6 pages) taken by Greg Borba May 1, 1996, from various sides of Northridge property
Exhibit No. 257	Memorandum dated April 8, 1996, from Richard Weinman to Lisa Lee re employment numbers
Exhibit No. 258	City of Redmond Land Use Comments on UPDs
Exhibit No. 259	Resume' of Tim Trohimovich
Exhibit No. 260	Redmond/Quadrant Corporation Utility Extension Agreement
Exhibit No. 261	Letter dated May 3, 1996, from Shawn J. Aronow (Seattle Water) to Lisa Lee (LUSD)

The following exhibits were offered and entered into the hearing record **May 8, 1996:**

Exhibit No. 262	Written testimony of Roger Shell
Exhibit No. 263:	Letter dated May 8, 1996, from Donald S. Berkowitz (Bear Creek Citizens for Growth Management) to Stafford L. Smith
Exhibit No. 264	Packet of photographs of site and surrounding area submitted by Steve O'Donnell
Exhibit No. 265	Statement prepared and read into hearing record by Sue Balsiger
Exhibit No. 266	Statement of Mike Tiano

The following exhibits were offered and entered into the hearing record **May 9, 1996:**

Exhibit No. 267	Resume' of John Couch
Exhibit No. 268	City of Redmond Master Plan for Watershed Trails
Exhibit No. 269	Northridge Urban Planned Development and Fully Contained Community Development Agreement between King County, Washington and The Quadrant Corporation
Exhibit No. 270	Northridge FCC Permit Application dated March 12, 1996

The following exhibits were offered and entered into the hearing record **May 13, 1996:**

Exhibit No. 271	Keith Goldsmith testimony outline
Exhibit No. 272	Bar graph prepared by SWM staff.

The following exhibits were offered and entered into the hearing record **May 14, 1996:**

Exhibit No. 273	Summary of Curtis Koger testimony
Exhibit No. 274	Summary of Lou Lepp testimony
Exhibit No. 275	Summary of Derek Booth testimony

The following exhibits were offered and entered into the hearing record May **15, 1996:**

Exhibit No. 276	Briefing information - GMPC, May 5, 1996, Transportation Concurrency Management Program (with attachments)
Exhibit No. 277	Excerpt from May 13, 1996, Journal American entitled "One thing is for certain: The Eastside is earthquake country"
Exhibit No. 278	Copy of "letter to editor" from May 14, 1996, Journal American

The following exhibits were offered and entered into the hearing record **May 16, 1996:**

Exhibit No. 279	Northridge Modflow Calibration - April 1996
Exhibit No. 280	Undated memorandum (faxed May 13, 1996) from Joel Massmann to Derek Booth
Exhibit No. 281	Memorandum dated May 2 1996, from Richard Horn to Derek Booth
Exhibit No. 282	Outline of Charles Ellingson testimony
Exhibit No. 283	Photocopy of transparencies used in Ellingson testimony
Exhibit No. 284	Northridge UPD Stormwater Management Plan (Exhibit H)

The following exhibits were offered and entered into the hearing record **May 17, 1996:**

Exhibit No. 285	Transcript of John Phillips testimony - Blakely Ridge public hearing
Exhibit No. 286	Transcript of James Carr testimony - Blakely Ridge public hearing
Exhibit No. 287	Certificate of transcription (Phillips and Carr testimonies)
Exhibit No. 288	Resume' of James R. Carr
Exhibit No. 289	Resume' of Tom Meyer
Exhibit No. 290	Hard copy of slides used in Meyer testimony
Exhibit No. 291	Well location map annotated by Dr. Palmquist
Exhibit No. 292	Annotated AES Cross Section A-A' re-annotated by Dr. Palmquist
Exhibit No. 293	Annotated AES Cross Section B-B' annotated by Dr. Palmquist
Exhibit No. 294	Middle Whidbey (Primary) aquifer channel map annotated by Dr. Palmquist
Exhibit No. 295	Figure 5.7 from AGI review of EIS annotated by Dr. Palmquist
Exhibit No. 296	Upper Possession Aquifer Potentiometric Map annotated by Dr. Palmquist
Exhibit No. 297	Robert C. Palmquist resume'
Exhibit No. 298	James Bailey resume'
Exhibit No. 299	Memorandum prepared by Papadopoulos & Assoc.
Exhibit No. 300	Transparency of Figure 3, Draft City of Redmond Wellhead Protection Delineation Technical Memorandum - annotated by James

Bailey

The following exhibits were offered and entered into the hearing record **May 20, 1996:**

Exhibit No. 301	Dr. Kindig's testimony outline
Exhibit No. 302	City of Redmond Land Use comments on UPDs
Exhibit No. 303	Outline of Testimony of Tim Trohimovich
Exhibit No. 304	Excerpt from 1994 King County Comprehensive Plan
Exhibit No. 305	Excerpt from Bear Creek Basin Plan
Exhibit No. 306	City of Redmond Park Board LOS Recommendations
Exhibit No. 307	National Recreation and Park Association Recreation, Park and Open Space Standards and Guidelines
Exhibit No. 308	Photocopy of transparency entitled "Inconsistent Alternatives Analysis"
Exhibit No. 309	Photocopy of transparency entitled "Use of Wetland Buffers as Filters
Exhibit No. 310	Estimated Pollutant Loads on Novelty Hill Road in 2005
Exhibit No. 311	Color photographs of stormwater drainage ponds
Exhibit No. 312	Greg Johnston's testimony summary (formerly listed as Exh. No. 311)

The following exhibits were offered and entered into the hearing record **May 21, 1996:**

Exhibit No. 313	Lundquist hearing testimony summary (formerly listed as Exh. No. 312)
Exhibit No. 314	Letter dated February 16, 1996, from Richard Lundquist to Lisa Lee (formerly listed as Exh. No. 313)
Exhibit No. 315	Map from 1994 King County Comprehensive Plan showing areas highly susceptible to ground water contamination (formerly listed as Exh. 314)
Exhibit No. 316	Toedtli rebuttal summary
Exhibit No. 317	Fluctuation figures for three wetlands (submitted by Bill Oakes)

The following exhibits were offered and entered into the hearing record **May 22, 1996:**

Exhibit No. 318	Novelty Hill Ranch Estates HOA's proposed mitigations
Exhibit No. 319	City of Redmond Proposed mitigations for water resource impacts
Exhibit No. 320	
A	Staff's proposed Northridge Fully Contained Community Permit and Urban Planned Development Permit Proposed Conditions (revised May 22, 1996)
B	Addendum to May 22, 1996, Revised Northridge Permit Conditions
Exhibit No. 321	Staff's Proposed P-suffix Conditions (revised May 22, 1996)
Exhibit No. 322	Port Blakely 's Proposed Permit Revisions
Exhibit No. 323	City of Redmond's proposed transportation mitigation
Exhibit No. 324	Union Hill Water Association's Proposed

Conditions of Approval for Northridge Urban
Planned Development and Fully Contained
Community dated May 22, 1996

Exhibit No. 325 Union Hill Water Association's Northridge
Urban Planned Development Proposed Ground
Water Monitoring Plan dated May 8, 1996

Exhibit No. 326 Coalition for Public Trust's List of Proposed
Conditions

Exhibit No. 327 Northridge Travel Time Analyses dated May 22,
1996, prepared by Transpo and submitted by
Applicant

Exhibit No. 328 Excerpt: City of Redmond Planning
Commission's Recommended Comprehensive Plan
(May 1995 - Final Draft) pages 120, 121 and
124

Exhibit No. 329 Excerpt: City of Redmond Planning
Commission's Recommended Comprehensive Plan
(May 1995 - Final Draft) map, and pages 229
and 230

Exhibit No. 330 Associated Earth Sciences' Rebuttal Testimony

Exhibit No. 331 King County Assessor's map showing Novelty
Hill Ranch Estates (outlined in green)

Exhibit No. 332 Testimony prepared and read into hearing
record by Barbara Beeson

Exhibit No. 333 Five and Ten-year Time-of-travel Capture
Zones

Exhibit No. 334 Letter dated May 15, 1996, from Greg Gaasland
(KCM) regarding sensitivity check of KC
factor on Northridge project with attached
graphs and tables

Exhibit No. 335 Letter dated May 22, 1996, from Coalition for
Public Trust with argument for denial of
FCC/UPD (with attachments)

Exhibit No. 336 Letter dated May 22, 1996, from Larry
Malakoff (for Lake of the Woods HOA) giving
reasons for keeping Blakely Ridge/Northridge
midpoint review

Exhibit No. 337 Testimony prepared and read into hearing
record by Neville Gordon-Carroll

Exhibit No. 338 King County Transit Division's Six-Year
Transit Development Plan for 1996-2001
(December 1995) and Appendices (December
1995)

Exhibit No. 339 King County Department of Transportation,
Planning Division's service profiles for
Northridge

Exhibit No. 340 Existing travel time/two-way, west bound, and
east bound PM peak hour assignments **(not
admitted as to travel time)**

Exhibit No. 341 King County Transportation Planning's revised
language for Novelty Hill Road fourth trigger
for road improvements

Exhibit No. 342 Memorandum faxed May 22, 1996, from Derek
Booth to Bill Oakes regarding reevaluation of
Northridge infiltration facilities

Exhibit No. 343 Biography of Robert B. Filley, Jr.

Exhibit No. 344 Metropolitan King County Growth Management
Planning Council Countywide Planning Policies
Benchmark Program Update: Cities' Household
and Employment Estimates as Adopted in their
Comprehensive Plans - May 7, 1996

Exhibit No. 345 Article entitled "Redmond boosted by two huge
new developments" from May 10-16, 1996, Puget
Sound Business Journal

Exhibit No. 346 8 x 10 color copies of Kreager testimony

Exhibit No. 347 slides
Central Puget Sound Growth Management
Hearings Board Final Decision and Order, and
Order on Motions to Reconsider and Motion to
Correct in Vashon-Maury, et al., v King
County.
Exhibit No. 348 Photographs taken by Greg Borba May 15, 1996,
from Novelty Hill Ranch Estates
Exhibit No. 349 Land Capacity Task Force report to Growth
Management Planning Council of King County -
November 1995
Exhibit No. 350 Novelty Hill Ranch Estates Existing Well Data

The following exhibits were offered and entered into the hearing
record May 24, 1996:

Exhibit No. 351 Testimony of Sam Pace
Exhibit No. 352 Letter dated May 4, 1996, from Vicky S.
Walker to Robert S. Derrick

Exhibit No. 353 Comment letters received at the Hearing
Examiner's office during the period of the
public hearing
a. Letter dated May 21, 1996 (received May 23),
from Novelty Neighbors (Denny Redman, agent)
to the Hearing Examiner
b. Letter dated May 21, 1996 (received May 23),
from Kris Colt to the Hearing Examiner
c. Letter dated May 22, 1996 (received May 23),
from Jeffrey A. Layton to the Hearing
Examiner
d. Letter dated May 22, 1996 (received May 22
by fax), from Lake of the Woods HOA (Larry
Malakoff) to the Hearing Examiner
e. Letter dated May 24, 1996 (received May 24
by fax) from Dawnbreaker Water Association
to the Hearing Examiner
f. Letter dated May 24, 1996 (received May 24
by fax) from Delora and Ron Ahlegian and the
Hearing Examiner